

# **EXHIBIT 3**

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Please clarify the impact of crossing credits and the different scenarios,

and B, with lower toll costs for truck trips in the region. Tolling Scenario G would generally reduce traffic, and the lower truck toll rate would reduce truck diversions to circumferential routes around the Manhattan CBD.

<sup>1</sup> Tolling Scenarios D, E, and F have the highest CBD tolls along with even higher discounts, exemptions, and/or crossing credits. These tolling scenarios would provide a full crossing credit at currently tolled facilities so that motorists would not have to pay both a facility toll and a CBD toll. This would equalize the effective tolls at all Manhattan CBD crossings and provide an incentive for some motorists currently using a toll-free facility (to avoid paying a toll) to shift to a currently tolled facility. The two facilities potentially most impacted by crossing credits are the Queens-Midtown Tunnel and the Hugh L. Carey Tunnel. The Queens-Midtown Tunnel would handle additional traffic volumes diverting primarily from the Ed Koch Queensboro Bridge, and the Hugh L. Carey Tunnel would handle additional traffic diverted from the Brooklyn Bridge and the Manhattan Bridge. The shift of traffic to the Hugh L. Carey Tunnel and the Queens-Midtown Tunnel has the potential of increasing traffic at these tunnels, along the highway approaches leading to the tunnels, and at nearby intersections adjacent to the tunnel portals. Under Tolling Scenarios C, D, and E, *[there would be larger reductions in]* regional vehicle miles traveled (VMT) than under Tolling Scenarios A, B, F, and G. However, for the Manhattan CBD, Tolling Scenarios D, E, and G would have the most *[substantial]* reductions in VMT.

All tolling scenarios would divert some Manhattan CBD through-traffic *[traveling between]* Brooklyn, Queens, Long Island, *[and]* points in New Jersey and beyond to circumferential routes using the George Washington Bridge via the Cross Bronx Expressway and the Verrazzano-Narrows Bridge via the Staten Island Expressway. The higher overall CBD tolls under Tolling Scenarios D, E, and F would result in higher circumferential diversions compared to Tolling Scenarios A, B, C, and G, with lower CBD tolls.

#### **4B.2.1 Summary of Highway Analysis to Determine Representative Tolling Scenario with Largest Increases in Traffic**

Preliminary analyses were performed for all tolling scenarios to identify which tolling scenario(s) would have the greatest potential for traffic effects at local intersections and along highway segments, and these tolling scenarios were analyzed in detail. **Table 4B-1** presents the change in peak-hour traffic volumes, referred to as the increment, for all tolling scenarios analyzed using the BPM. These increments were used to determine the representative tolling scenario for analysis, the facilities/highways to analyze in detail, and the direction of the highway that needed to be analyzed, inbound or outbound. <sup>4</sup>

The Lincoln Tunnel and Holland Tunnel would have negative increments in both directions, with reduced traffic volumes under all tolling scenarios during the peak hours in the inbound direction. Since these two facilities would generally operate with less or the same delay, they were not analyzed further.

<sup>4</sup> Highways are analyzed by direction using peak hour one-way traffic volumes while VMT, air quality, and noise analyses utilize two-way traffic volumes as inputs. Therefore, the applicable tolling scenario(s) with the highest potential for adverse effects may be different for traffic analyses than the scenario(s) used to analyze VMT, air quality, and noise effects.

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Are these scenarios contemplative of post-COVID statistics? Please clarify as we would like to better understand the scenarios.

Table 4B-1. **1** Peak-Hour Incremental Traffic Volumes: Comparison of Tolling Scenarios\*

| FACILITY/HIGHWAY   | DIRECTION | TIME PERIOD | PEAK-HOUR TRAFFIC VOLUME INCREMENT (VEHICLES) |            |            |            |            |            |            |
|--|-----------|-------------|---|------------|------------|------------|------------|------------|------------|
|  |           |             | SCENARIO A                                    | SCENARIO B | SCENARIO C | SCENARIO D | SCENARIO E | SCENARIO F | SCENARIO G |
| Lincoln Tunnel/<br>NJ Route 495                            | Inbound   | AM          | -407  | -433       | -209       | -86        | -205       | -162       | -533       |
|  |           | MD          | -434  | -478       | -283       | -147       | -269       | -109       | -508       |
|  |           | PM          | -248  | -243       | -141       | -73        | -135       | -140       | -287       |
|  | Outbound  | AM          | -137  | -149       | -177       | -173       | -178       | -184       | -177       |
|  |           | MD          | -561  | -584       | -631       | -695       | -741       | -639       | -651       |
|  |           | PM          | -629  | -672       | -647       | -784       | -888       | -805       | -770       |
| Holland Tunnel/I-78/<br>NJ Route 139                       | Inbound   | AM          | -206  | -231       | -127       | -78        | -164       | -143       | -309       |
|  |           | MD          | -213  | -231       | -147       | -105       | -189       | -70        | -285       |
|  |           | PM          | -300  | -310       | -215       | -140       | -242       | -246       | -386       |
|  | Outbound  | AM          | -210  | -229       | -267       | -293       | -307       | -317       | -260       |
|  |           | MD          | -311  | -354       | -422       | -463       | -519       | -465       | -403       |
|  |           | PM          | -96   | -103       | -71        | -18        | -81        | -15        | -109       |
| Queens-Midtown<br>Tunnel-Long Island<br>Expressway (I-495) | Inbound   | AM          | -188  | -186       | 253        | 126        | 127        | 125        | -192       |
|  |           | MD          | -114  | -113       | 224        | 383        | 385        | 379        | -120       |
|  |           | PM          | -420  | -358       | 241        | 203        | 202        | 202        | -409       |
|  | Outbound  | AM          | -61   | -65        | -67        | -25        | -30        | -24        | -63        |
|  |           | MD          | -229  | -240       | -251       | 163        | 165        | 162        | -211       |
|  |           | PM          | -273  | -268       | -316       | 350        | 335        | 343        | -278       |
| Hugh L. Carey Tunnel-<br>Gowanus Expressway                | Inbound   | AM          | 52  | 80         | 145        | 71         | 71         | 70         | 30         |
|  |           | MD          | -54   | -60        | 217        | 482        | 482        | 482        | -57        |
|  |           | PM          | 1   | 7          | 28         | 47         | 44         | 44         | -7         |
|  | Outbound  | AM          | 106   | 100        | 101        | 110        | 107        | 101        | 87         |
|  |           | MD          | 56  | 64         | 59         | 574        | 574        | 574        | 66         |
|  |           | PM          | -58   | -69        | -61        | 543        | 543        | 547        | -99        |

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This chart indicates tremendous increase in vehicles in and out of Hugh Carey Tunnel at different times and different scenarios. Has this analysis been used to analyze the movement of traffic from the CBD to the exempted thoroughfares and the resulting environmental impact?

Two facilities crossing the Manhattan CBD—the Queens-Midtown Tunnel and Hugh L. Carey Tunnel—would be expected to have higher increases in traffic volumes inbound under Tolling Scenarios C, D, E, and F compared to other tolling scenarios, some of which have a negative increment. The volume increments for these tolling scenarios generally fall within a very narrow range and are expected to have similar effects. Only the inbound direction was analyzed because that direction experiences higher levels of congestion and delays.

Two facilities that handle circumferential diversion of through Manhattan CBD trips—the Verrazzano-Narrows Bridge and the George Washington Bridge—are expected to have higher increases in outbound (westbound) traffic volumes under Tolling Scenarios C, D, E, and F compared to other tolling scenarios. The George Washington Bridge/Trans-Manhattan/Cross Bronx Expressway corridor was assessed analytically and qualitatively because the data to properly build and calibrate a Vissim microsimulation model were not available (and current data would not be representative given the COVID-19 pandemic). Only the outbound (westbound) direction was analyzed for both the George Washington Bridge (New Jersey-bound) and the Verrazzano-Narrows Bridge (Staten Island bound) because the volume increments and congestion would be higher in that direction.

For all highway analyses, Tolling Scenario D was chosen as the representative tolling scenario due to having daily volumes that land between Tolling Scenarios E and F. In addition, Tolling Scenario D generally presented larger peak-hour volumes. For these reasons, Tolling Scenario D was analyzed in detail. For congested roadway segments, a Vissim microsimulation model was used to analyze the No Action Alternative and the CBD Tolling Alternative for the representative tolling scenario where a model was available. For roadways operating at higher speeds of 40 mph or greater, the Highway Capacity Software (HCS) model was used. A qualitative and analytical method was used to analyze congested roadways where neither a Vissim model nor reliable pre-COVID-19-pandemic traffic data were available since the HCS is not applicable for evaluation of congested roadways. A qualitative approach was also used in instances where all tolling scenarios would result in lower traffic volumes at a facility and its approaches.

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How is this information used to analyze the movement of traffic from the CBD to the exempted thoroughfares?  
Please clarify.



Tolling Scenarios D, E, and F provide the most extensive crossing credits for tolls paid at existing tolled facilities and would result in the greatest shift of traffic to the Queens-Midtown Tunnel and the Hugh L. Carey Tunnel. These tolling scenarios also have the highest tolls, due to the need to offset the revenue loss due to crossing credits, resulting in the highest diversion to circumferential routes via the Verrazzano-Narrows Bridge and the George Washington Bridge. Although Tolling Scenarios D and F have the same number of exceedances of the threshold with 50 instances, Tolling Scenario D was selected for detailed traffic analysis because it has a higher number of potentially affected intersections in the critical Lower Manhattan Study Area. However, it should be noted that Tolling Scenarios D, E, and F are very similar and would be expected to have very similar potential traffic effects; therefore, Tolling Scenario D is considered to be the representative tolling scenario inclusive of Tolling Scenarios E and F.

The Synchro traffic model was used to perform a detailed analysis of intersections for Tolling Scenario D. An additional Synchro analysis was performed in the Downtown Brooklyn study area for Tolling Scenario C, which was determined to have a higher potential for traffic effects in two instances where the increase in traffic volumes is projected to be 50 or more vehicles.

Calibrated Vissim microsimulation traffic models adapted for the CBD Tolling Alternative were used to perform detailed traffic analyses of the highway approaches to the <sup>1</sup>Hugh L. Carey Tunnel and Queens-Midtown Tunnel, which are projected to have the highest increase in traffic volumes under Tolling Scenario D. A Vissim analysis was also performed at the Verrazzano-Narrows Bridge and its approaches to evaluate the potential traffic effects due to circumferential route diversion. An analytical and qualitative traffic analysis was performed at the George Washington Bridge including its approaches, and the Franklin D. Roosevelt (FDR) Drive near the Manhattan Bridge because pre-COVID-19-pandemic data were not available to create a Vissim traffic model at these locations. An estimation of the potential traffic effects was made based on the projected increase in traffic volumes in relation to the projected increase in traffic volumes at the Queens-Midtown Tunnel and the Long Island Expressway where detailed modeling was performed. Additional analyses were completed using HCS for the Bayonne Bridge, the Eastern Spur of I-95 New Jersey Turnpike, and a section of the Robert F. Kennedy (RFK) Bridge from Queens to the ramp connecting with the Manhattan leg of the RFK Bridge.

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How is this information used to analyze the movement of traffic from the CBD to the exempted thoroughfares?  
Please clarify.

60th Street. There are entrances from Second Avenue, East 57th, East 58th, and East 59th Streets. There is no toll to cross this bridge.

The **Queens-Midtown Tunnel** is a vehicular tunnel under the East River from the east side of Manhattan, in the residential neighborhood of Murray Hill, to the Hunters Point District of Long Island City. In Queens, the tunnel merges directly into the Long Island Expressway (I-495), which is approximately 1.5 miles west of the Long Island Expressway interchange with the Brooklyn-Queens Expressway (BQE). There are two tubes—one eastbound and one westbound—with two travel lanes each, although one lane of the eastbound tube is operated contra-flow during the AM peak period. In Manhattan, the tunnel is accessed via East 34th Street, East 36th Street, and Second Avenue. Vehicles exiting the tunnel can access East 37th Street or East 41st and East 34th Streets via Tunnel Exit Street. The TBTA collects tolls in both directions.

### BROOKLYN CROSSINGS

The **Williamsburg Bridge** connects the Lower East Side of Manhattan at Delancey Street with the Williamsburg neighborhood of Brooklyn. In Brooklyn, it is fed by the BQE (I-278) and various local streets. In Manhattan, it is primarily fed by Delancey Street. The Williamsburg Bridge has eight lanes of vehicular traffic, two subway tracks, a pedestrian walkway, and a bikeway. There is no toll to cross this bridge.

The **Manhattan Bridge** connects Lower Manhattan at Canal Street to Downtown Brooklyn at Flatbush Avenue. In Manhattan, it is primarily fed by Canal Street. In Brooklyn, it is fed by the BQE (I-278), Flatbush Avenue, and various local streets. The Manhattan Bridge has seven lanes of vehicular traffic, four subway tracks, a pedestrian walkway, and a bikeway. There is no toll to cross this bridge.

The **Brooklyn Bridge** connects Lower Manhattan near City Hall to Downtown Brooklyn. In Manhattan, it is fed by the FDR Drive, Center Street/Park Row, and other local streets. In Brooklyn, it is fed by the BQE (I-278), Cadman Plaza, and various local streets. The bridge has two inbound travel lanes, three outbound travel lanes, and a pedestrian path. A travel lane in the Manhattan-bound direction was recently converted into a two-way bicycle lane, which is included in the No Action Alternative roadway network. There is no toll to cross this bridge, and commercial vehicles are prohibited.

<sup>1</sup>The **Hugh L. Carey Tunnel** (I-478) connects the southern tip of Manhattan with Red Hook in Brooklyn. There are two tubes—one northbound and one southbound—with two travel lanes each. During the AM and PM, one of the lanes operates in a contra-flow direction to provide more peak direction lane capacity. In Manhattan, the tunnel is fed by West Side Highway/Route 9A and local streets. In Brooklyn, it is fed by the BQE (I-278), the Gowanus Expressway, Prospect Expressway, and local streets. The TBTA collects tolls in both directions.

### NEW JERSEY CROSSINGS

Three vehicular Hudson River crossings provide connections between New Jersey and Manhattan of which only the two tunnels connect directly to the Manhattan CBD. The Port Authority of New York and New Jersey collects tolls on the following crossings in the eastbound direction.

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How is this information used to analyze the movement of traffic from the CBD to the exempted thoroughfares?  
Please clarify.

Table 4B-22. Estimated Increase of Traffic on the Lower FDR Drive\*

| PERIOD |             | NORTHBOUND |       | SOUTHBOUND |        |
|--------|-------------|------------|-------|------------|--------|
|        |             | Low        | High  | Low        | High   |
| AM     | Peak Period | 1,586      | 1,871 | 1,947      | 2,735  |
|        | Peak Hour   | 324        | 370   | 294        | 356    |
| MD     | Peak Period | 1,219      | 1,535 | 2,524      | 4,117  |
|        | Peak Hour   | 249        | 313   | 281        | 458    |
| PM     | Peak Period | 83         | 403   | 1,776      | 2,918  |
|        | Peak Hour   | 61         | 231   | 404        | 666    |
| Daily  |             | 2,352      | 4,472 | 8,845      | 12,145 |

Source: WSP, 2022.

Notes:

1. Daily volumes will not equal peak-period increments due to values being pulled from differing tolling scenarios.
2. Peak-period increments are from the BPM (unadjusted).
3. Peak-hour volumes are estimated using an average and adjusted for accuracy.
4. Low = Tolling Scenarios A, B, C, and G
5. High = Tolling Scenarios D, E, and F
- \* NYCDOT reduced the number of lanes on the BQE from three lanes to two lanes in each direction on August 30, 2021, between Atlantic Avenue and Sands Street, to preserve the life of the cantilever structure. This has caused some motorists to divert to the FDR Drive. **1 The Project is expected to cause additional motorists to divert to the FDR Drive to avoid congestion along the BQE.**

***AM Peak Hour (8:00 a.m. to 9:00 a.m.)***

In the northbound direction, the AM peak-hour volume is expected to increase by about 324 to 370 vehicles. Typically, traffic flows freely along the lower FDR Drive in the northbound direction during the AM peak and it is anticipated that the additional traffic can be accommodated. In the southbound direction, the AM peak-hour volume is expected to increase by about 294 to 356 vehicles. Typically, traffic flows freely along the lower FDR Drive in the southbound direction during the AM peak, and it is anticipated that the additional traffic can be accommodated for all tolling scenarios.

***MD Peak Hour (1:00 p.m. to 2:00 p.m.)***

In the northbound direction, the MD peak-hour volume is expected to increase by about 249 to 313 vehicles. Typically, traffic flows freely along the lower FDR Drive in the northbound direction during the MD peak and it is anticipated that the additional traffic can be accommodated. In the southbound direction, the peak-hour volume is expected to increase by about 281 to 458 vehicles. Typically, traffic flows freely along the lower FDR Drive in the southbound direction during the MD peak, and it is anticipated that the additional traffic can be accommodated for all tolling scenarios.

***PM Peak Hour (5:00 p.m. to 6:00 p.m.)***

In the northbound direction, the PM peak-hour volume is expected to increase by about 61 to 231 vehicles. Typically, traffic flows freely along the lower FDR Drive in the northbound direction during the PM peak and it is anticipated that the additional traffic can be accommodated for all scenarios, aside from Tolling Scenario B. Under this tolling scenario, the projected increase in traffic volume would be marginally above the 5 percent threshold (at 5.8 percent), resulting in potential adverse effects.

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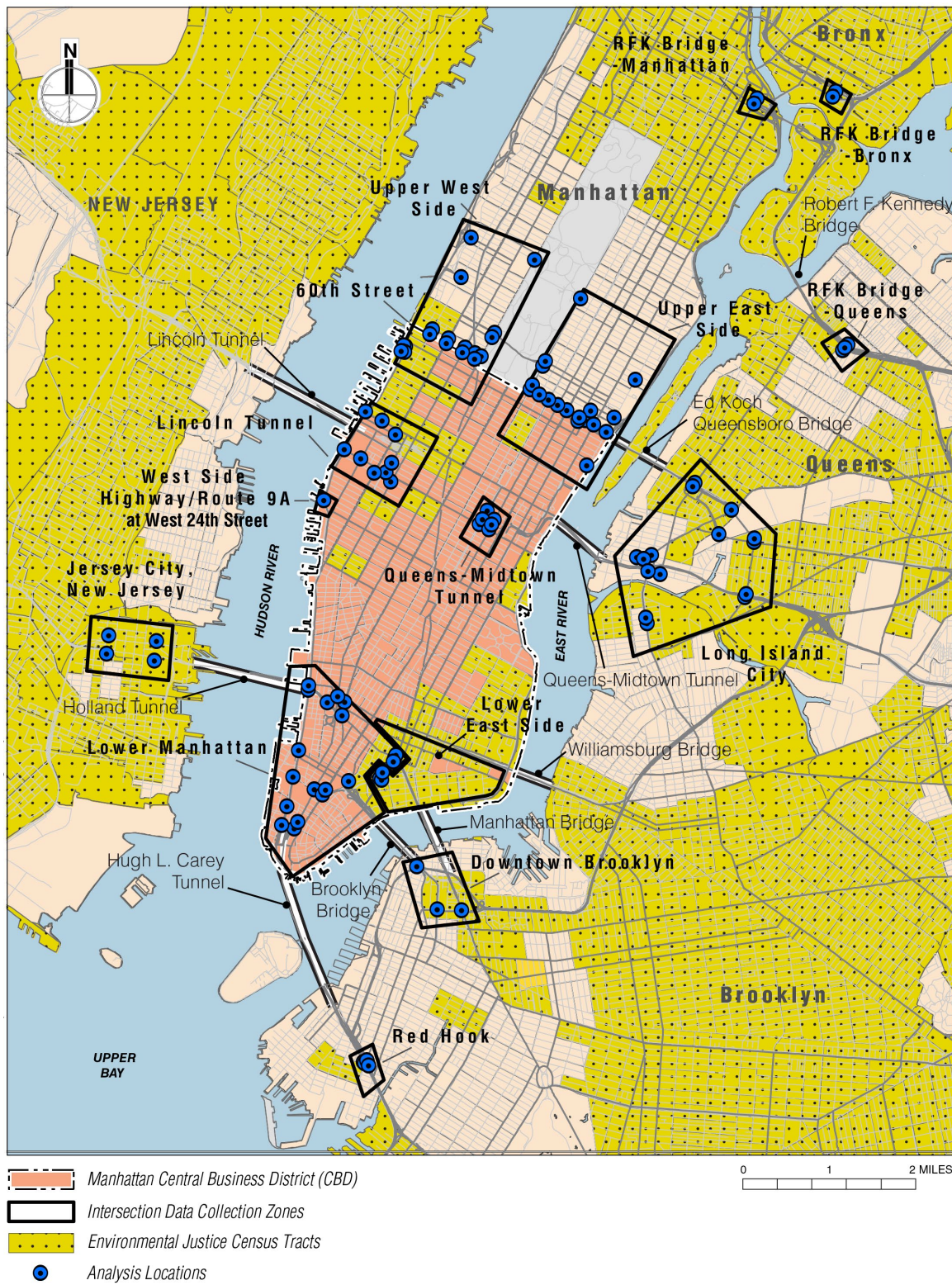


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Please clarify the level of analysis conducted to determine the impact of increased congestion on the exempted thoroughfares for NY County as a whole as well as communities like BPC.



Figure 4B-13. **1** Local Intersections and Data Collection Zones

\*Broadway & West 179th Street location is located north of illustrated map extent, though demonstrates *No Adverse Impact*

Source: ESRI, NYC Open Data, NYMTC 2020 TransCAD Highway Network.

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This figure indicates that huge swaths of neighborhoods had no data collection, particularly those around the exempted thoroughfares. Please clarify? Why isn't NY County treated as one for purposes of environmental justice?



Table 4E-4. **1** No Action Alternative, CBD Tolling Alternative, and CBD Tolling Alternative with Improvement Measures—Pedestrian Level of Service Analysis—Herald Square/Penn Station New York

| LOCATION  | PROJECT IMPROVEMENT MEASURES  | NO ACTION |     | CBD TOLLING |     | CBD TOLLING (IMPROVED) |     |
|---|---|-----------|-----|-------------|-----|------------------------|-----|
|   |   | SFP       | LOS | SFP         | LOS | SFP                    | LOS |
| Weekday AM Peak Hour  |   |           |     |             |     |                        |     |
| West sidewalk along Eighth Avenue between West 34th Street and West 35th Street | Provide 0.5 feet of additional width by removing constricting sidewalk obstruction (relocate movable planter so it is not directly across from parking sign pole; easy to implement). | 31.5      | D   | 28.3        | D   | 31.4                   | D   |
| Sixth Avenue and West 34th Street: north crosswalk                              | Widen the crosswalk by 2 feet (easy to implement).  | 12.8      | E   | 10.6        | E   | 11.8                   | E   |
| Seventh Avenue and West 32nd Street: north crosswalk                            | Widen the crosswalk by 1 foot (easy to implement).  | 12.7      | E   | 11.4        | E   | 12.0                   | E   |
| Weekday PM Peak Hour  |   |           |     |             |     |                        |     |
| West sidewalk along Eighth Avenue between West 34th Street and West 35th Street | Provide 0.5 feet of additional width by removing constricting sidewalk obstruction (relocate movable planter so it is not directly across from parking sign pole; easy to implement). | 28.6      | D   | 25.7        | D   | 28.7                   | D   |
| Sixth Avenue and West 34th Street: north crosswalk                              | Widen the crosswalk by 2 feet (easy to implement).  | 6.8       | F   | 6.0         | F   | 6.8                    | F   |

Source: AKRF, Inc.

The monitoring results will be compared to the No Action SFP and LOS as well as the *CEQR Technical Manual* thresholds described above to validate the need for, and design of, mitigations such as crosswalk restriping, movable obstruction relocation, and other improvements as necessary to ensure there will be no adverse effects. **Table 4E-4** also notes the relative ease of implementation of each recommended measure.

## **2** World Trade Center/Fulton Street

With implementation of the CBD Tolling Alternative, the west sidewalk of Broadway between Liberty and Cortlandt Streets during the AM and PM peak hours and the northwest corner of Broadway and Liberty Street during the PM peak hour would operate at LOS C or better. The northwest corner of Broadway and Liberty Street would operate at LOS D in the AM peak hour with a decrease of 1.9 SFP as compared to LOS C in the No Action Alternative. Based on the expected LOS and the *CEQR Technical Manual* adverse effects criteria, the CBD Tolling Alternative would not result in any adverse pedestrian effects at pedestrian elements near World Trade Center/Fulton Street.

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Please clarify any similar analysis conducted with respect to exempted thoroughfares, particularly along West St where there is pedestrian traffic due to, for example, schools, work, residential, stores, playgrounds and parks/recreation.



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Please clarify any similar analysis conducted with respect to exempted thoroughfares, particularly along West St where there is pedestrian traffic due to, for example, schools, work, residential, stores, playgrounds and parks/recreation.

## 5A. Population Characteristics and Community Cohesion

### 5A.1 INTRODUCTION

This subchapter assesses whether changes to population characteristics or travel patterns resulting from implementation of the CBD Tolling Alternative would affect community cohesion, community facilities and services, and access to employment. It also evaluates the effects of the CBD Tolling Alternative on certain vulnerable social groups, including elderly populations, persons with disabilities, transit-dependent populations, and nondriver populations. **Chapter 17, “Environmental Justice,”** presents an evaluation of the Project’s effects on low-income and minority populations and an analysis of whether the Project would result in disproportionately high and adverse effects on minority and low-income populations in accordance with Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.”

### 5A.2 METHODOLOGY

#### 5A.2.1 *Analysis Framework*

FHWA’s Technical Advisory T6640.8A provides guidance on the content of environmental documents prepared pursuant to NEPA and FHWA’s procedures that implement NEPA.<sup>2</sup> In addition, FHWA’s *Community Impact Assessment: A Quick Reference for Transportation* (Community Impact Assessment guidance) provides information on how to conduct a Community Impact Assessment and guidance on analyzing community impacts for transportation actions.<sup>3</sup> **The Project Sponsors followed the guidance in these documents in preparing the analysis in this chapter. FHWA’s Technical Advisory T6640.8A identifies categories of resources that project sponsors should consider when assessing the environmental consequences of their undertakings, and the Community Impact Assessment guidance identifies types of community impacts to consider.**

Consistent with FHWA Technical Advisory T66040.8A and the FHWA Community Impact Assessment guidance, this subchapter provides an overview of key population characteristics in the New York City region and evaluates potential effects on community cohesion, community facilities and services, certain social groups, and access to employment.

**Community cohesion is the degree to which groups of people with shared attributes or affinities—such as cultural, religious, artistic, or activity-based communities—can form and maintain communities that are not limited to any particular location or neighborhood.** Community cohesion is usually expressed as a “sense of belonging” or a level of commitment to a community, or a strong attachment to neighbors,

<sup>2</sup> FHWA. October 30, 1987. FHWA Technical Advisory T6640.8A, “Guidance for Preparing and Processing Environmental and Section 4(f) Documents.” [www.environment.fhwa.dot.gov/legislation/nepa/guidance\\_preparing\\_env\\_documents.aspx#aa](http://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx#aa).

<sup>3</sup> FHWA. 2018 Update. FHWA-PD-96-036. *Community Impact Assessment: A Quick Reference for Transportation*. [www.fhwa.dot.gov/livability/cia/quick\\_reference/ciaguide\\_053118.pdf](http://www.fhwa.dot.gov/livability/cia/quick_reference/ciaguide_053118.pdf).

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The sponsors need to do an assessment for Battery Park as this was not completed and is largely affected by this program.



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The sponsors need to do an assessment for Battery Park as this was not completed and is largely affected by this program.

groups, and institutions, usually because of continued appreciation over time. FHWA Technical Advisory T66040.8A defines potential effects on community cohesion as, “[c]hanges in the neighborhoods or community cohesion for the various social groups as a result of the proposed action. These changes may be beneficial or adverse, and may include splitting neighborhoods, isolating a portion of a neighborhood or an ethnic group, generating new development, changing property values, or separating residents from community facilities, etc.”<sup>4</sup> In addition, the FHWA Community Impact Assessment guidance identifies types of community impacts, including displacement of residents and adverse effects on public facilities. As such, this subchapter also considers Project effects related to the potential for residential displacement and effects on community facilities and services—such as public or publicly funded schools, libraries, childcare centers, health care facilities, and fire and police protection.

Consistent with FHWA Technical Advisory T66040.8A, this subchapter also addresses potential effects on certain social groups, such as elderly populations, persons with disabilities, transit-dependent populations (those who use transit as their primary mode for some or all trips, irrespective of vehicle ownership), and nondriver populations. Changes in travel patterns and accessibility can affect these population sub-groups as they may rely on certain modes of transportation or certain accessibility patterns.

### 5A.2.2 Study Area

The analysis of social conditions in this subchapter considers potential effects of the No Action Alternative and CBD Tolling Alternative on the 28-county region and the Manhattan CBD. The 28-county regional study is shown in **Figure 5A-1** and described in **Chapter 3, “Environmental Analysis Framework.”** It includes New York City and the surrounding region, which represents the primary catchment area for trips to and from the Manhattan CBD.

### 5A.2.3 Data Sources

Unless otherwise noted, information on population characteristics is based on the U.S. Census Bureau’s 2015–2019 American Community Survey (ACS) 5-Year Estimates. The evaluation of the Project’s effects on these population characteristics is based on the results of comprehensive regional transportation modeling conducted for the Project as described in **Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling.”**

<sup>4</sup> FHWA. October 30, 1987. FHWA Technical Advisory T6640.8A, “Guidance for Preparing and Processing Environmental and Section 4(f) Documents.” [www.environment.fhwa.dot.gov/legislation/nepa/guidance\\_preparing\\_env\\_documents.aspx#aa](http://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx#aa).

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There is no data or analysis that was done for the Battery Park neighborhood area which is directly affected by this plan.

## 5A.3 AFFECTED ENVIRONMENT

### 5A.3.1 *Regional Context*

The New York City metropolitan region is a very large and diverse area of some 12,500 square miles and a regional population of about 22.2 million residents. New York City is the center of the regional study area, which includes portions of three states—New York, New Jersey, and Connecticut—and is home to approximately 22.2 million residents according to the 2015–2019 ACS. **Figure 5A-1** shows the regional study area, with the five counties of New York City at the center, two counties to the east on Long Island, seven counties to the north of New York City in New York and Connecticut, and 14 counties to the west and south in New Jersey. The study area extends approximately 170 miles from east to west and approximately 175 miles from north to south. <sup>1</sup> The region reflects a high level of social and economic diversity and its development patterns range from dense urban core areas in and around New York City to lower density suburban communities and low-density exurban areas.

The regional study area has a wide range of population densities, land uses, and development densities reflecting the long history of settlement patterns, the regional transportation network, and the location of the region's cities, communities, and neighborhoods. Other than large tracts of open space or lands owned by the State or Federal government, there are no unincorporated areas and there are more than 700 incorporated municipalities (boroughs, villages, towns, and cities) within the 28 counties of the regional study area. These incorporated municipalities range from small boroughs and villages—often with fewer than 5,000 residents, larger townships and towns, subregional urban areas, and cities. Large or small, these communities generally provide for essential community facilities and services and maintain their own planning, zoning, and development controls that define the character of the community. New York City is the urban center with its 8.4 million residents and, after New York City, the next largest city in the region is Newark in Essex County, New Jersey, with a population of approximately 281,000, followed by Jersey City in Hudson County, New Jersey, and Yonkers in Westchester County, New York, with populations of 262,000 and 200,000, respectively.

<sup>2</sup> New York City is the most densely populated city in the United States.<sup>5</sup> As shown in **Figure 5A-2**, four of its five boroughs (counties)—the Bronx, Brooklyn, Manhattan, and Queens—are densely populated; in addition, the adjacent county across the Hudson River in New Jersey, Hudson County, is also densely populated. Other counties in the regional study area are more suburban in character, and density decreases at greater distance from New York City. New York City's population of 8.4 million people is approximately 38 percent of the regional population and yet its combined land area of 423 square miles represents only about 3.4 percent of the total land area of the region. The 28-county region is a mature metropolitan region with a long history of development patterns that are reflected in its transportation network and its population distribution.

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<sup>5</sup> New York City Department of City Planning. [www1.nyc.gov/site/planning/planning-level/nyc-population/newest-new-yorkers-2013.page](http://www1.nyc.gov/site/planning/planning-level/nyc-population/newest-new-yorkers-2013.page).

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There is no data or analysis that was done for the Battery Park neighborhood area which is directly affected by this plan.



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There is no data or analysis that was done for the Battery Park neighborhood area which is directly affected by this plan.

Further, this density point further highlights the study focusing on parts of NY County separately and not as a whole.






The region has a dense transportation network of highways and public transportation, including commuter rail, subway, light rail, buses, and ferries. Because New York City, and particularly Manhattan, has long been the economic center of the region, the transportation network is predominantly oriented to providing connections to and from Manhattan and New York City overall. Transportation links to Manhattan include the roads and highways that lead to and from the tunnels and bridges linking Manhattan to the region. The historic transportation patterns are most notable in the legacy infrastructure of fixed transportation routes (railroads, subways, and ferries) that connect the region to the city, and all five boroughs of New York City to the Manhattan CBD. The level of density in the urban core is reflected in the extensive transit network, frequent service throughout the region, and 24-hour service on the New York City subway and bus system. As depicted on **Figure 5A-3**, nearly all areas of New York City are within a half-mile of subway, commuter rail, Select Bus Service (SBS), or express bus service.<sup>1</sup> One-half mile represents an approximately 10-minute walk for an average pedestrian, and therefore indicates the availability of these transportation services. In addition, New York City has a very dense local bus network, and all areas of the city are within a half-mile of a local bus stop other than one neighborhood in Queens (Breezy Point, a gated community in southern Queens). As discussed in **Section 5A.3.4**, most people use public transportation to travel to and from the Manhattan CBD.

Farther from New York City, the suburban and exurban areas of the regional study area have commuter rail and bus service that lead to New York City, with towns centered around commuter rail stations, but also include a more decentralized road network serving the greater region that developed as the region grew with a more auto-oriented development pattern. The highway network includes roads that do not connect to New York City at all as well as circumferential highways such as I-95, I-287, and I-84 that pass through New York City but largely bypass the Manhattan CBD. The expansion of the larger and decentralized highway network but the limited roadway capacity of the historic links to, from, and within Manhattan is reflected in the chronic congestion in Manhattan as described in **Chapter 1, "Introduction."**

<sup>2</sup> At the hub of the regional study area, the Manhattan CBD is the traditional economic center of the region. It extends almost 5 miles from the tip of Lower Manhattan on the south to 60th Street on the north, and approximately 2 miles from the Hudson River on the west to the East River on the east. The Manhattan CBD includes the densely developed commercial areas of Lower Manhattan and Midtown Manhattan as well as residential neighborhoods within and around these business-oriented areas. **Subchapter 5B, "Social Conditions: Neighborhood Character,"** provides more detailed discussion of the neighborhoods and geographic areas of the Manhattan CBD.

<sup>3</sup> Other areas of New York City are connected to the Manhattan CBD through the city's extensive transit system, which carries 85 percent of daily commuter trips to and from the Manhattan CBD, as well as by bridges and tunnels connecting the road and highway network to Manhattan. One of the city's five boroughs, Staten Island, is more geographically isolated from the rest of New York City, and is connected by highway bridges to Brooklyn and New Jersey (which carry express buses between Staten Island and Manhattan) and is linked to Manhattan by the iconic Staten Island Ferry. Staten Island is more suburban in character than other parts of New York City with less racial and ethnic diversity than the rest of New York City, and a housing stock with lower density.

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-  Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:23:56 PM  
Access to the transit network requires crossing of a major highway for Battery Park residents and poses a higher risk for physical injury, car accidents, and air and noise pollution. This was not studied or taken into account.
- 
-  Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:30:09 PM  
Battery Park (West of West Side Highway) is not included in these details or studies and would be greatly affected by these charges.
- 
-  Number: 3 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:30:09 PM  
How are the statistics calculated? Is it pre-Covid? Post-Covid, are the numbers different?
-

### 5A.3.3 *Community Facilities and Services*

Community facilities include schools, libraries, childcare centers, health care facilities, and police and fire protection. Throughout the region, most community facilities are locally focused, serving their individual communities, although some have a larger regional draw. Other facilities, such as homeless shelters, food pantries and meal distribution services, jails, community centers, colleges and universities, and religious and cultural facilities, are also community facilities and services and these serve a broader regional need.

#### 5A.3.3.1 LIBRARIES

There are some 200 branch libraries in New York City and hundreds more in individual communities in the region. The region includes some major, central libraries, such as the main library of the New York Public Library system within the Manhattan CBD and the main library of the Brooklyn Public Library system outside the Manhattan CBD, as well as many smaller libraries throughout the region. The regional libraries, like other large cultural institutions with a regional draw, attract visitors with specific needs (i.e., research projects or other specialized tasks).

#### 5A.3.3.2 SCHOOLS

Similarly, schools are decentralized and located throughout the city and region, serving their local communities. In New York City, the New York City Department of Education (NYCDOE) provides transportation to all eligible New York City students in public, charter, and non-public schools. NYCDOE transportation services vary by school and each child's eligibility for those services. In general, NYCDOE provides student MetroCards for students living more than one-half mile from their school, and may provide yellow school bus service, depending on the age of the student, distance to school, and the student's disability status.<sup>9</sup> Many students, especially those in Manhattan where school catchment zones are small given the population density, walk or take transit to school.

The Manhattan CBD includes approximately 125 public schools serving some 60,000 students, as well as charter schools and private and parochial schools. Based on recent surveys conducted by the NYCDOE, approximately 8 percent of the public school students who live within the Manhattan CBD use school buses to get to school; the rest use public transit, walk, or bicycle to school.

#### 5A.3.3.3 MEDICAL FACILITIES

Like other services in a community, health clinics, urgent care, doctors' offices, and community hospitals are present throughout the regional study area and typically serve their local communities. The 28-county study area also has healthcare facilities, including specialists and hospitals, with a larger, regional (and, in some cases, national and international) draw because of the specialty services they provide. Some of these are within the Manhattan CBD and others are outside. For example, specialty hospitals and associated doctors' offices are located throughout Manhattan, including within the Manhattan CBD on the east side

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<sup>9</sup> MetroCard is the primary payment method for the New York City subway and New York City and MTA buses. Student MetroCards are distributed by schools to students whose home is one-half mile or farther from their school. These MetroCards allow three free rides each school day between 5:30 a.m. and 8:30 p.m., including free transfers between buses or between the subway and local, limited, and SBS buses.

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This analysis omits private car transportation for school, whether through taxi or personal cars. Please clarify the analysis.

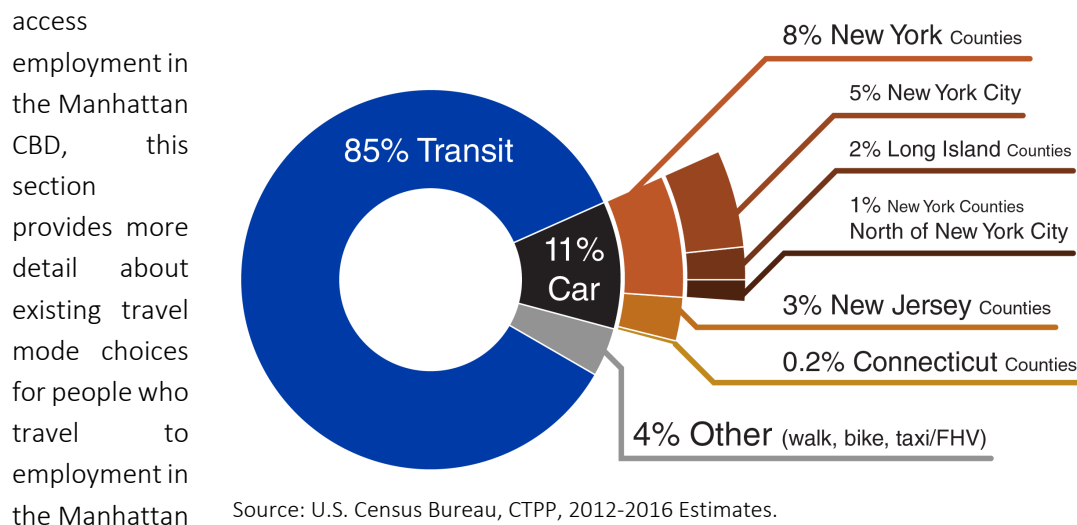
the Bronx (59 percent), and Brooklyn (56 percent), than in the region (28 percent). These households without access to a vehicle are part of the region's transit-dependent population. Vehicle access generally increases with income,<sup>14</sup> resulting in a greater number of all auto trips being made by those reporting a higher income than by households that reported a lower income.<sup>15</sup>

As shown in Figure 5A-5 (on the following page), the percentage of households with no access to a vehicle generally decreases with distance from the Manhattan CBD. While some counties just outside New York City have vehicle access rates similar to those of New York City counties, these adjacent counties typically have a much lower share of commuters to the Manhattan CBD. For example, Hudson County in New Jersey has an auto ownership rate similar to that of Queens, but it contributes only 5 percent of the commuters to the Manhattan CBD, compared to 17 percent from Queens.

### 5A.3.5 Access to Employment in the Manhattan CBD

Chapter 1, "Introduction," describes the commuting behaviors of workers commuting to the Manhattan CBD, both by mode and by county of origin (Figure 5A-4). Given that the Project would directly affect the use of driving

Figure 5A-4. Work Trips Entering Manhattan CBD (by mode and origin)



CBD. It also provides a more detailed discussion of the use of driving modes to commute to Manhattan from areas of New York City that do not have convenient transit access, since these areas may have fewer alternative to vehicle access for convenient travel to the Manhattan CBD.

<sup>14</sup> FHWA. Status of the Nation's Highways, Bridges, and Transit Conditions & Performance 23rd Edition. Chapter 3, "Travel." <https://www.fhwa.dot.gov/policy/23cpr/chap3.cfm#access-to-vehicles>.

<sup>15</sup> Trip purpose categories included "Work," "School," "Social/Recreational," "Shopping," and "Other"; more detailed options comprising "Other" included "Personal Business," "Home to Serving Passengers/Serving Passengers to Home," and "Other." New York Metropolitan Transportation Council and New Jersey Transportation Planning Authority. October 2014. 2010/2011 Regional Household Travel Survey. p. 124 (Table 4-19). [www.nymtc.org/portals/0/pdf/RHTS/RHTS\\_FinalExecSummary10.6.2014.pdf](http://www.nymtc.org/portals/0/pdf/RHTS/RHTS_FinalExecSummary10.6.2014.pdf).

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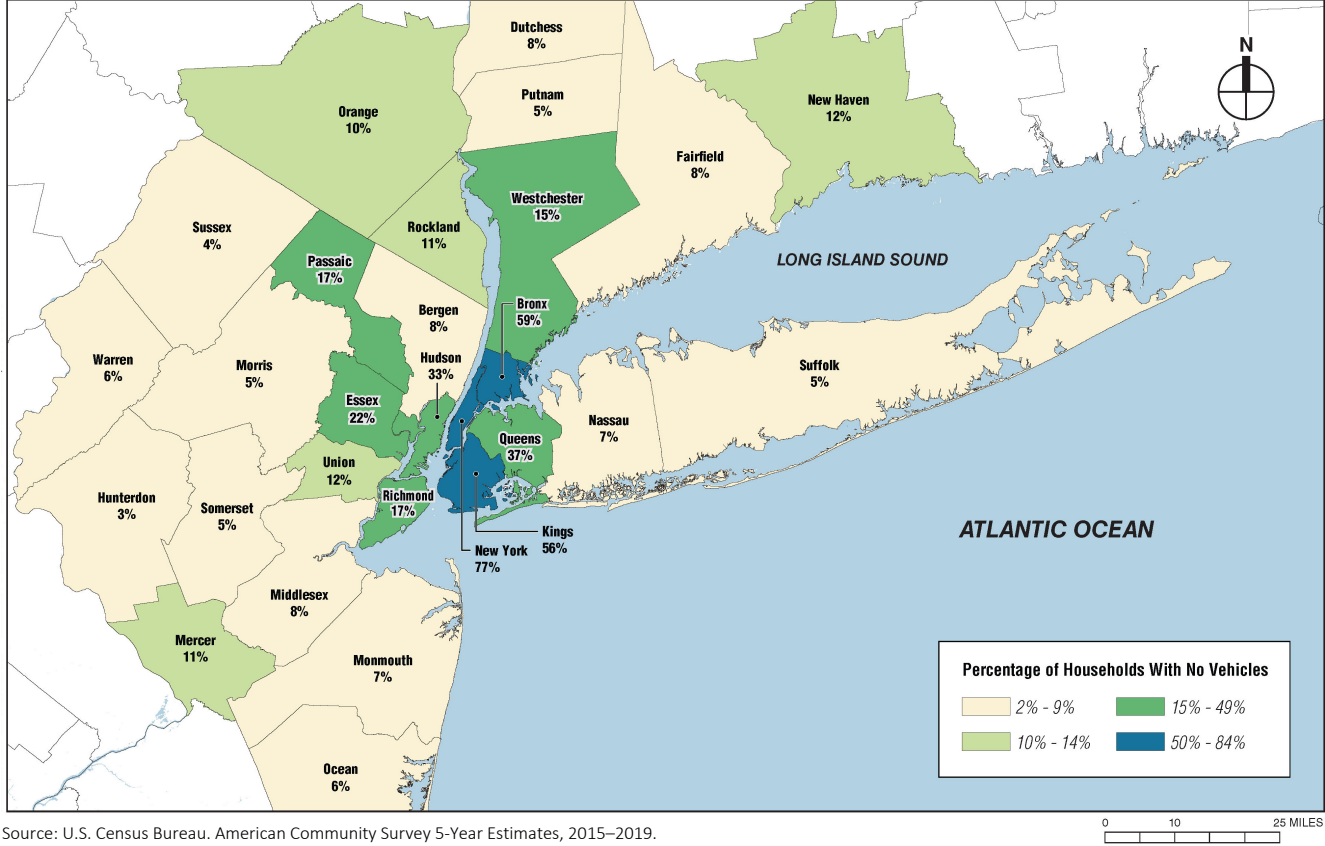


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This should also factor in the number of people that have switched from mass transit to alternate options as mass transit has become less safe and more crime has taken place in MTA stations.

Figure 5A-5. **1** Households in the Regional Study Area with No Vehicle by County



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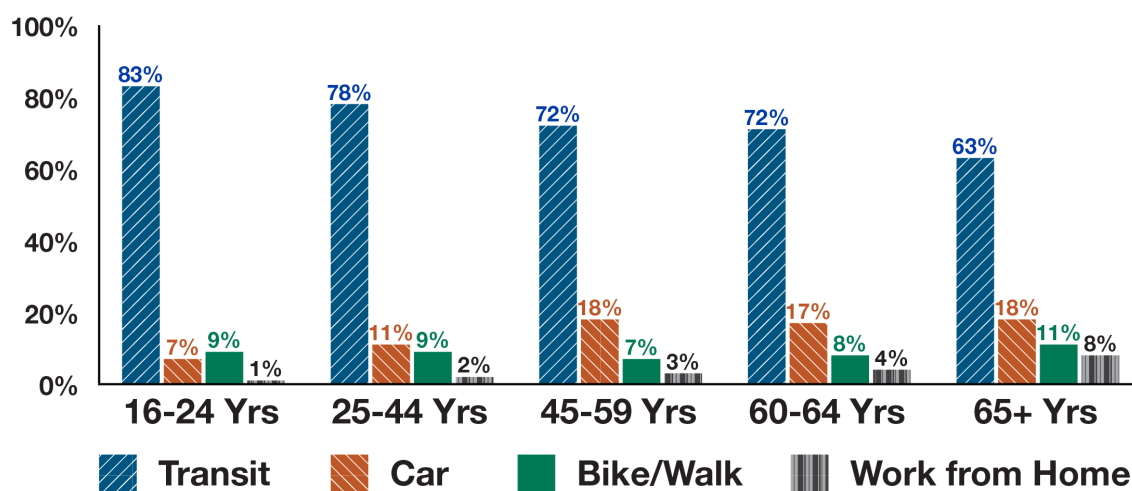
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Was BPC included in this study? If so, are the statistics before or after Covid?



**Figure 5A-6** provides data on the commute mode choice for travel to work in Manhattan by the age distribution of workers. The most detailed estimates available describe those working in Manhattan as a whole, but these data provide some insight into commute mode and worker age. As **Figure 5A-6** shows, the rate of driving or other auto modes to work is highest for ages 45 and over, with approximately 17 percent to 18 percent of workers commuting to Manhattan by auto. The use of public transportation to commute to work decreases with age, with the lowest rate (63 percent) for workers age 65 and older; even for this age group, the majority of workers use public transportation to commute to work in Manhattan.

**Figure 5A-6. Travel Modes to Work (by age of workers)**



Sources: Census Transportation Planning Package, American Community Survey 2012-2016

Residents of New York City in particular are most likely to use transit to travel to work in the Manhattan CBD (see **Chapter 1, "Introduction," Figure 1-6**). With a dense network of public transportation options throughout New York City and 24-hour service throughout that network, CTPP data indicate that 88 percent of the New York City residents who travel to work in the Manhattan CBD from outside the CBD use public transportation<sup>16</sup> for their commute. All of New York City is within one-half mile of a commuter rail station, subway station, or bus stop except one small area in southern Queens, a gated community called Breezy Point (see **Figure 5A-3**).

**1** Most of New York City is also within one-half mile of the faster public transportation modes available—commuter rail, subway, express bus, or Select Bus Service (SBS), New York City’s growing bus rapid transit system.<sup>17</sup> As shown in **Figure 5A-3**, few neighborhoods in New York City are more than one-half mile from these faster transportation modes. These areas are at the periphery of the city and along the waterfront (and, as noted, do have local bus service). In Manhattan, these areas include the far west side in the West 50s within the Manhattan CBD and on Roosevelt Island outside the Manhattan CBD. In Brooklyn, areas

<sup>16</sup> Unless otherwise noted, the terms “public transportation” and “transit” are used interchangeably throughout this chapter.

<sup>17</sup> One-half mile represents an approximately 10- to 15-minute walk for an average pedestrian, and therefore indicates the availability of these transportation services.

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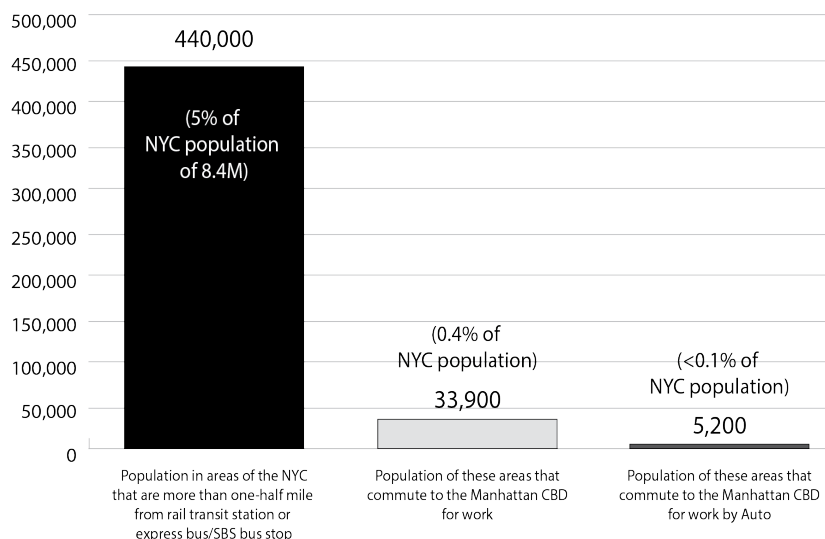
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Except the Battery Park neighborhood.

include the neighborhoods of Red Hook, Borough Park, Rugby-Remsen Village, East New York, and Canarsie. In Queens, portions of the Astoria, College Point, South Ozone Park, Auburndale, Springfield Gardens, Breezy Point, Maspeth, and Ridgewood neighborhoods do not have access to faster public transportation via commuter rail, subway, or express bus/SBS service within one-half mile. In the Bronx, portions of the Soundview, Castle Hill, East Tremont, and Wakefield neighborhoods are more than one-half mile from commuter rail, subway, or express bus/SBS service. In Staten Island, these areas are around the shoreline and in central Staten Island. Some of the areas in New York City that are not close to transit are places from which no one commutes by car to the Manhattan CBD (see **Figure 5A-3**).

Approximately 440,000 people (or about 5.2 percent of the city's 8.4 million residents) live in these areas of New York City that are more than one-half mile from the faster public transportation modes of commuter rail, subway, or express bus/SBS service,<sup>18</sup> and approximately of them 33,900 commute to the Manhattan CBD (**Figure 5A-7**). Approximately 5,200 (15 percent) of these commuters to the Manhattan CBD travel by car.<sup>19</sup> These 5,200 car commuters come from locations distributed around the city with the largest concentrations in the Queens neighborhoods of Maspeth, College Point, Middle Village, and Springfield Gardens, the Soundview neighborhood of the Bronx, and Staten Island. Additional residents may be auto commuters who pass through the Manhattan CBD, but the total number of auto trips, even from areas with less convenient public transit access, is small even if these trips are included. **Chapter 17, "Environmental Justice,"** considers the potential effect of implementation of the CBD Tolling Alternative on low-income and minority populations who live in these areas.

**Figure 5A-7. Population and Commuters to Manhattan CBD from Areas More than One-Half Mile from Commuter Rail, Subway, or Express Bus Service**



Source: U.S. Census Bureau, CTPP, 2012–2016 Estimate.

Note: All areas of New York City other than Breezy Point, Queens, are within a half mile of local bus service.

<sup>18</sup> This population consists of people living within census tracts that are not within one-half mile of the faster public transportation services, when measured from the center of the census tract to the nearest transit stop.

<sup>19</sup> 2012–2016 CTPP.

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This study should include any individuals that do not have access to mass transit options or are unable to.

Outside of New York City, the rest of the regional study area is also well-served by public transportation, including commuter rail, light rail, and public and private bus routes, and as noted previously, most people who work in the Manhattan CBD use public transportation to travel to and from work. In areas of the regional study area that are farther from New York City and less densely developed and populated, more areas are not within a convenient walking distance of public transportation. However, in those areas, households have a higher rate of access to a vehicle, and residents use or may use their vehicles to access public transportation (e.g., commuter rail stations).

## 5A.4 **ENVIRONMENTAL CONSEQUENCES**

### 5A.4.1 *No Action Alternative*

The No Action Alternative would not implement a vehicular tolling program with its associated tolling infrastructure and tolling system equipment. With the No Action Alternative, the study area's settlement patterns, transportation mobility (including chronic congestion in and around the Manhattan CBD) would remain similar to the existing affected environment. Overall demographic trends in terms of population and job growth would experience normal background growth. Community cohesion and access to employment for residents of the region would likely be similar to existing conditions.<sup>20</sup>

### 5A.4.2 *CBD Tolling Alternative*

This section describes the potential effects of implementation of the CBD Tolling Alternative on population characteristics and community cohesion, when compared with the No Action Alternative, beginning with a description of the potential benefits of the CBD Tolling Alternative and how they relate to social conditions. The section then evaluates the potential effects of the CBD Tolling Alternative on community cohesion and community facilities and services, its potential benefits or adverse effects to certain vulnerable social groups, including elderly populations, persons with disabilities, transit-dependent populations, and nondriver populations; and its effects on access to employment at the regional level.

#### 5A.4.2.1 **POTENTIAL BENEFITS TO SOCIAL CONDITIONS**

With implementation of the CBD Tolling Alternative, transportation users in the region would benefit through travel-time savings, improved travel-time reliability, reduced vehicle operating costs, improved safety, and reduced air pollutant emissions. These changes would positively affect community connections and access to employment, education, healthcare, and recreation for residents. The CBD Tolling Alternative would result in the following social benefits:

- **Travel-Time Savings:** People in the region making trips to or within the Manhattan CBD by auto, FHV/taxi, bus, paratransit, or truck would benefit from travel-time savings improvements relative to the No Action Alternative due to decreased congestion within the Manhattan CBD. Part of these travel-time savings benefits would be offset by the increased transportation cost for those trips under the CBD Tolling Alternative in the form of a toll. People traveling by vehicle in the Manhattan CBD would

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<sup>20</sup> Existing conditions described in this chapter are for conditions prior to the onset of the COVID-19 pandemic and therefore do not reflect changes to social conditions that may emerge as the pandemic subsides. At this time, it would be speculative to describe long-term (post-pandemic) changes to social conditions.

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An extensive study needs to take place for Battery Park (zip codes 10280 and 10282).

also benefit from travel-time savings due to decreased congestion in the Manhattan CBD and on other roadways.<sup>1</sup> These benefits would occur in all tolling scenarios, with a reduction in vehicles crossing into the Manhattan CBD each day ranging from 15.4 percent to 19.9 percent and a reduction in daily VMT in the Manhattan CBD of 7.1 percent to 9.2 percent (see Table 4A-5 and Table 4A-7 in Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling”). Tolling Scenario E would result in the greatest benefit, with 19.9 percent fewer vehicles entering the Manhattan CBD each day and a reduction of 9.2 percent in VMT relative to the No Action Alternative.

- **Reliability Benefits:** People traveling by auto, taxi/FHV, bus, paratransit, or truck to or within the Manhattan CBD would benefit from improved travel-time reliability due to the reduced congestion. Improvements to transportation system capacity or reliability can have social benefits such as greater ease of making and maintaining social ties and higher quality of life. Reliability of travel time refers to the level of travel time uncertainty. When travel times are unpredictable, travelers typically allow more time for their trip to account for possible delays. By reducing congestion in the Manhattan CBD, the CBD Tolling Alternative would reduce the current uncertainty associated with travel in the Manhattan CBD and allow travelers to reduce the buffer time set aside for their trip. Benefits would accrue not only to automobile passengers but also to bus passengers who would be able to rely on evenly spaced buses with reliable schedules. These benefits would also apply to school bus passengers and users of paratransit services.
- **Safety Benefits:** In all tolling scenarios, the CBD Tolling Alternative would result in fewer vehicles accessing the Manhattan CBD, which would help to reduce conflicts between vehicles and between vehicles and pedestrians and bicyclists, leading to an overall benefit to safety. The reduction in regional VMT because of the CBD Tolling Alternative could also lead to regional safety benefits. Some research indicates that VMT is directly related to the rate of fatal crashes;<sup>21</sup> therefore, the reduction in VMT could lead to a decrease in traffic fatalities in the region. Enhanced safety would benefit social conditions by improving community connectivity, reducing social isolation, and facilitating more physical activity and use of nonmotorized modes of transportation. While the increase in potential safety benefits may be offset to some degree by the propensity for drivers to drive at greater speeds in less congested conditions, experience with the London congestion-based pricing system suggests that the overall effect would be net positive; within the London zone, between 2000 and 2010 traffic collisions decreased by 40 percent per VMT.<sup>22</sup>
- **Accessibility Benefits:** Accessibility can be understood as the attractiveness of a place of origin (how easy it is to get from there to all other destinations) or of a destination (how easy it is to get to there from all other origins). Enhanced accessibility can benefit social conditions by improving community connections and access to employment, education, health care, and recreation. The CBD Tolling Alternative would improve accessibility for travelers throughout the region by decreasing roadway congestion. The CBD Tolling Alternative would also improve accessibility for disabled individuals

<sup>21</sup> Reid Ewing, Shima Hamidi and James Grace. 2016. “Urban Sprawl as a Risk Factor in Motor Vehicle Crashes,” *Urban Studies*, Vol. 53/2, pp. 247 to 266. [digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=https://www.google.ca/&httpsredir=1&article=1911&context=usgsstaffpub](https://digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=https://www.google.ca/&httpsredir=1&article=1911&context=usgsstaffpub).

<sup>22</sup> Davis, Alex. 2015. “London’s Congestion Pricing Plan is Saving Lives.” *Wired Magazine*. <https://www.wired.com/2015/03/londons-congestion-pricing-plan-saving-lives/>.

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-  Number: 1 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:56:43 PM  
A study outlining the impacts to the Battery Park neighborhoods needs to be conducted as this is not accurate.
- 
-  Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:56:43 PM  
A study outlining the impacts to the Battery Park neighborhoods needs to be conducted as this is not accurate.
- 
-  Number: 3 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:56:43 PM  
A study outlining the impacts to the Battery Park neighborhoods needs to be conducted as this is not accurate.



throughout the region by providing benefits to improve paratransit services, such as reduced roadway congestion and travel-time improvements as discussed above.

#### 5A.4.2.2 COMMUNITY COHESION

This section evaluates potential effects to community cohesion resulting from the CBD Tolling Alternative. As noted previously in the discussion of the affected environment, community cohesion and civic life in the regional study area are typically local, organized around neighborhoods and communities, and in most cases are not focused on economic, social, and cultural ties to the Manhattan CBD. Therefore, this analysis focuses on the three primary ways the CBD Tolling Alternative could potentially affect community cohesion through travel pattern changes to and from the Manhattan CBD:

- **Installation of Tolling Infrastructure and Equipment:** The CBD Tolling Alternative would involve the installation of tolling infrastructure and tolling system equipment. This analysis considers whether this infrastructure and equipment would create a physical barrier that could separate or isolate communities.
- **Changes to Travel Patterns:** The CBD Tolling Alternative would change travel patterns and alter people's choices of how to travel into and out of the Manhattan CBD and would encourage more people to use transit to access the Manhattan CBD. The concern with respect to changing travel patterns and greater use of transit services is whether these changes would weaken community cohesion either by making it more difficult for people to physically connect with others throughout the region or by overburdening transit infrastructure that communities rely on for social ties.
- **Potential for Residential Displacement:** The CBD Tolling Alternative would not require any property acquisition or direct displacement of residences. This analysis evaluates whether implementation of the CBD Tolling Alternative would have the potential to result in indirect displacement of residents.


The following subsections address each of these concerns with respect to community cohesion. In addition, Chapter 17, "Environmental Justice," considers these effects on low-income and minority populations.


##### *Installation of Tolling Infrastructure and Equipment*

The CBD Tolling Alternative would place tolling infrastructure and tolling system equipment within or adjacent to existing transportation rights-of-way, including sidewalks, and, in very limited instances, public parkland. As discussed in Chapter 2, "Project Alternatives," Section 2.4.2.2, the tolling infrastructure would include poles and mast arms, similar to those used for streetlights and traffic lights today; tolling system equipment including reader and meter cabinets and cameras; and signage similar in size and character to signs already present throughout Manhattan. Chapter 2, "Project Alternatives," Figure 2-3 illustrates the proposed infrastructure; in addition, figures in Chapter 9, "Visual Resources," provide before and after views of selected locations where new tolling infrastructure and tolling system equipment is proposed. The signage would be similar in size and nature to existing signs already in place. Therefore, this tolling infrastructure, tolling system equipment, and signage would not create a physical barrier that could separate or isolate communities, and therefore would not result in adverse effects to community cohesion.

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What is the environmental and noise impact to the Battery Park neighborhood? Has this been reviewed?

 Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 12:56:43 PM  
When would this start and how can they mitigate for environmental or noise pollution? What is the environmental and noise impact to the Battery Park neighborhood?

*Changes to Travel Patterns*

The new toll for vehicles entering or remaining in the Manhattan CBD with the CBD Tolling Alternative would change travel patterns and alter people's choices of how to travel into and out of the Manhattan CBD. This section summarizes the changes in daily trips under the No Action Alternative and with the CBD Tolling Alternative. The transportation modeling conducted for the Project using the Best Practice Model (BPM) provides information on the projected changes in travel patterns between the No Action Alternative and the CBD Tolling Alternative (**Subchapter 4A, "Transportation: Regional Transportation Effects and Modeling"**). The BPM results include changes in daily journeys, which are the round-trips from origin to destination and back to origin again.<sup>23</sup> The BPM is a regional transportation model used to predict changes in mode and route that would result from modifications to the transportation system, using adopted regional population, labor force, and employment forecasts. The model does not (and cannot) predict changes to the numbers of residents, workers, or jobs in the region but rather assumes that those numbers remain constant.

**1** The section presents the change in total daily journeys to the Manhattan CBD and the change in non-work-related journeys (e.g., daily round trips with any combination or linked trips excluding the journey to work such as school, shopping, medical care, or entertainment purposes) to the Manhattan CBD. The different tolling scenarios would have varying effects on different areas (e.g., New Jersey vs. Long Island), and the particular tolling scenario that would result in the greatest change in trips varies depending on the area. This section presents data on travel patterns for each tolling scenario for each subarea of the regional study area.<sup>24</sup> The travel pattern data presented in this section include all modes of transport, including auto modes, public transportation modes, and walking and biking.<sup>25</sup>

**2** *Changes to Total Daily Journeys to the Manhattan CBD by All Modes*

Overall, the model results show that all tolling scenarios would result in changes to the distribution of total daily journeys to the Manhattan CBD compared to the No Action Alternative, with an increase in total daily journeys from New Jersey and Long Island and a decrease in total daily journeys from portions of New York north of New York City, and Upper Manhattan, the Bronx, Queens, and Brooklyn. **Table 5A-2** and **Table 5A-3** present data on projected total daily journeys to the Manhattan CBD for each tolling scenario. The largest decrease in travel via all modes (i.e., including auto, public transportation, and walk/bike modes) into the Manhattan CBD would be approximately 3 percent for areas of Manhattan outside the Manhattan CBD under Tolling Scenario D. Daily journeys between New Jersey counties and the Manhattan CBD would increase by 1.9 percent to 3.5 percent and daily journeys between Long Island and the Manhattan CBD would increase by 2.5 percent to 3.7 percent, depending on the tolling scenario. In New York City, daily journeys to and from the Manhattan CBD would decrease in the Bronx, Brooklyn, other areas of Manhattan, and Queens, but would increase in Staten Island. The rest of Manhattan would have the largest percentage

<sup>23</sup> More specifically, as described in **Subchapter 4A, "Transportation: Regional Transportation Effects and Modeling,"** a journey is defined as round-trip travel between principal and anchor locations such as home, work, school, retail, and entertainment.

<sup>24</sup> Subareas include each New York City county (boroughs), outside the Manhattan CBD, inside the Manhattan CBD, Long Island counties, New York counties north of New York City, New Jersey counties, and Connecticut counties.

<sup>25</sup> Modes of transport in the BPM consist of the following: drive alone, high-occupancy vehicle/shared ride, taxi/FHV, commuter rail, other transit (e.g., subway, bus), walk and bike, and school bus.

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A study for Battery Park needs to be conducted.



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A study needs to be done for the Battery Park neighborhoods as they would be impacted and no study has taken place. What is the environmental and noise impact to the Battery Park neighborhood?

The journeys presented in the BPM results are for travel undertaken between two geographic areas for a particular reason—work, school, shopping, medical care, entertainment, etc. These are activities that indicate social and community ties between two areas. An increase in total daily journeys and daily non-work-related journeys to the Manhattan CBD suggests that a geographic area would potentially have more social ties and stronger community connections to the Manhattan CBD with the CBD Tolling Alternative as compared to the No Action Alternative. As described in the previous subsection, areas that would see increases in daily trips to the Manhattan CBD include New Jersey, Long Island, and Staten Island. The model results also show marginal increases in nonwork-related Manhattan CBD journeys originating within the Manhattan CBD, indicating additional journeys and connections for Manhattan CBD residents likely due to the reduction in congestion in the Manhattan CBD.

A decrease in total daily journeys and daily non-work-related journeys to the Manhattan CBD suggests that a geographic area could have fewer social ties and weaker community connections to the Manhattan CBD with the CBD Tolling Alternative as compared to the No Action Alternative. However, as described earlier, the decreases in total daily journeys and daily non-work-related journeys would be small—in general, decreases of about 4 percent or less depending on the origin geographic area and the tolling scenario. Where decreases of more than 4 percent would occur (e.g., the decrease in daily non-work-related journeys from New York counties north of New York City), the number of forgone journeys would be very small (approximately 900 journeys under Tolling Scenario E), compared to overall number of daily non-work-related journeys to the Manhattan CBD. Moreover, as noted earlier, the decrease in non-work-related journeys to the Manhattan CBD would be from origins distributed throughout the 28-county study area, from many different communities throughout the region. <sup>1</sup> The decrease in total daily journeys and daily non-work-related journeys to the Manhattan CBD and their distribution throughout the region, rather than from particular locations or communities, indicates that most regional social ties and community connections to the Manhattan CBD would be maintained with the CBD Tolling Alternative.

For New York City, the model results predict decreases in total daily journeys and non-work-related journeys to the Manhattan CBD from Brooklyn, Queens, the Bronx, and areas of Manhattan north of 60th Street. In these areas, many different communities, including the physical neighborhoods and other cultural, religious, artistic, or activity-based communities, are closely tied to the Manhattan CBD. The decrease in non-work-related journeys to the Manhattan CBD from areas of Manhattan north of 60th Street, Brooklyn, Queens, and the Bronx, indicate that the CBD Tolling Alternative would discourage some travel into the Manhattan CBD by making driving there more expensive. As previously described, the forgone journeys to the Manhattan CBD from other areas of New York City would be a very small portion of the total daily journeys and non-work-related journeys to the Manhattan CBD from those areas, indicating that community cohesion and connection to the Manhattan CBD would be maintained. As noted earlier in the discussion of the affected environment, most people use transit to make their trips to the Manhattan CBD, and these trips would not be affected by the CBD Tolling Alternative.

<sup>2</sup> Areas of New York City outside the Manhattan CBD have transit access to the Manhattan CBD and would not be isolated from community services or ties within the Manhattan CBD (see **Figure 5A-3**). For example, Manhattan's Chinatown neighborhood is an important destination for New York City's Chinese American

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A study needs to be done for the Battery Park neighborhoods as they would be impacted and no study has taken place. What is the environmental and noise impact to the Battery Park neighborhood?



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A study needs to be done for the Battery Park neighborhoods as they would be impacted and no study has taken place. What is the environmental and noise impact to the Battery Park neighborhood?

community, as are other specific neighborhoods throughout New York City and the region, such as those in Flushing, Queens; and Sunset Park, Bensonhurst, and Sheepshead Bay, Brooklyn. Access to Manhattan's Chinatown may be important for community cohesion among residents of these neighborhoods, and these areas would continue to have transit access to the Manhattan CBD with the CBD Tolling Alternative. Within Manhattan, neighborhoods are highly walkable or <sup>1</sup>accessible via transit across 60th Street into the Manhattan CBD for most people. (For a discussion of effects on vulnerable social groups, including elderly populations, persons with disabilities, and transit-dependent populations, see **Subsection 5A.4.2.4, "Effects on Vulnerable Social Groups,"** later in this subchapter.)

<sup>2</sup>As described in **Subchapter 4A, "Transportation: Regional Transportation Effects and Modeling,"** the CBD Tolling Alternative would result in a mode shift to transit across the region, with some of the decline in auto access to the Manhattan CBD translating to increases in transit trips (e.g., commuter rail, subway, bus, tram, and ferry). As discussed in **Subchapter 4C, "Transportation: Transit,"** the CBD Tolling Alternative would not result in adverse effects to the line-haul capacity of transit services serving the Manhattan CBD. None of the passenger increases on rail and subway transit routes or buses entering the Manhattan CBD, or on the Staten Island Ferry, would result in adverse effects related to line-haul capacity.<sup>26</sup> For subway routes, passenger increases would be below the impact threshold increment of 5 or more new passengers per car during the AM peak hour. There would be increased ridership on bus routes that would be accommodated by existing service levels. The CBD Tolling Alternative would also result in an increase in the number of passengers using transit stations in the regional transit system. As discussed in **Subchapter 4C, "Transportation: Transit,"** with improvements, the CBD Tolling Alternative would not result in unmitigated adverse effects on transit stations. Consequently, overall, potential transit ridership increases resulting from the CBD Tolling Alternative would not adversely affect community cohesion by overburdening transit infrastructure.

Notwithstanding the transit accessibility between the Manhattan CBD, New York City, and the regional study area, there would be an additional cost with the CBD Tolling Alternative for individuals who choose to drive, who do not have access to transit, or who must rely on driving to get to the Manhattan CBD. As noted in **Chapter 17, "Environmental Justice,"** and **Chapter 18, "Agency Coordination and Public Participation,"** during early public outreach for the Project in fall 2021, members of the public raised concerns related to the increased cost of travel to the Manhattan CBD for low-income drivers, low- and middle-income families in the Manhattan CBD, and residents of the Manhattan CBD travelling regionally to visit family and friends outside the Manhattan CBD. The costs incurred by individuals driving to the Manhattan CBD would vary widely, depending on individual circumstances and the specific tolling scenario (see **Subchapter 4A, "Transportation: Regional Transportation Effects and Modeling,"** **Section 4A.4.5**). The greatest cost would be incurred by those who make frequent driving journeys to the Manhattan CBD during peak hours. Driving to and from the Manhattan CBD is already expensive given the very limited availability of free or low-cost parking and the cost of off-street parking or taxi/FHV fares, and it is likely that people who drive regularly have higher incomes.<sup>27</sup> Individuals who drive less frequently would incur lower costs

<sup>26</sup> Transit line-haul capacity is the capacity of a transit mode at its peak ridership point.

<sup>27</sup> FHWA. *Status of the Nation's Highways, Bridges, and Transit. Conditions & Performance. 23rd Edition.* Chapter 3 Travel. Impact of Income Distribution on Travel. October 22, 2020. <https://www.fhwa.dot.gov/policy/23cpr/index.cfm>.

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This is not accurate for Battery Park City.



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This is not accurate. A study needs to be done for the Battery Park neighborhoods as they would be impacted and no study has taken place. What is the environmental and noise impact to the Battery Park neighborhood?



because of the toll. *[See Chapter 17, “Environmental Justice,” Section 17.7, for mitigation measures the Project Sponsors will implement to address increased costs for low-income drivers to the Manhattan CBD, including new measures added for the Final EA.]*

### ***Potential for Residential Displacement***

**1** Another concern related to community cohesion is the potential for a project to affect population and housing characteristics of an area by causing direct or indirect residential displacement.

Direct residential displacement occurs when residents must move from their homes as a direct result of an action. As noted above, the tolling infrastructure and tolling system equipment associated with the CBD Tolling Alternative would be within or adjacent to existing transportation rights-of-way, including sidewalks, and, in very limited instances, public parkland, and would not involve the acquisition of private property or the displacement of any residential uses.

Indirect residential displacement occurs when a change in socioeconomic conditions resulting from a project leads to conditions that require residents to move, such as increased rents or other increases in the cost of living. As noted in **Chapter 17, “Environmental Justice,”** and **Chapter 18, “Agency Coordination and Public Participation,”** during early public outreach for the Project in fall 2021, members of the public voiced concerns about the potential for indirect displacement of low-income residents to occur as a result of the CBD Tolling Alternative.

Indirect residential displacement can occur when a project results in substantial new development that is markedly different from existing uses, development, and activities within a neighborhood, and thus alters one or more of the underlying forces that shape real estate market conditions in an area. The CBD Tolling Alternative would not result in substantial new development or uses that would be markedly different from existing uses and activities within neighborhoods. More importantly, as discussed in this subsection, the CBD Tolling Alternative would not alter socioeconomic conditions related to the following, and therefore would not be likely to result in indirect displacement:

- Potential for residents relocating to avoid the cost of the toll
- Potential for indirect displacement because of increased cost of living within the Manhattan CBD or elsewhere

#### **Potential for Residents Relocating to Avoid the Cost of the Toll**

The CBD Tolling Alternative would introduce a new cost for residents of the Manhattan CBD who travel by vehicle into and out of the Manhattan CBD. However, only a small percentage of journeys within and from the Manhattan CBD are by vehicle, and residents who travel by other modes would not pay the toll. As described earlier in this subchapter in the discussion of the affected environment, approximately 20 percent of the residents of the Manhattan CBD have access to a vehicle. Based on the BPM results, approximately 1.0 million total daily journeys would occur within or from the Manhattan CBD under any tolling scenario and in the No Action Alternative, and approximately 10 percent of these journeys would be by driving (either the drive alone, high-occupancy vehicle, or taxi/FHV modes). In addition, residents of the Manhattan CBD whose New York adjusted gross income for the taxable year is less than \$60,000 would be

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A study needs to be done for the Battery Park neighborhood as it would be impacted and no study has taken place. What is the environmental and noise impact to the Battery Park neighborhood?

indirect displacement of low-income residents. However, this is unlikely to occur, because the CBD Tolling Alternative would not result in changes in market conditions that would increase real estate values, so as to result in increased rents; the CBD Tolling Alternative would not result in an increase in the cost of goods within the Manhattan CBD; and low-income residents of the Manhattan CBD would be entitled to a tax credit to offset their tolls.

In terms of increased real estate values, as noted earlier, any changes in residential patterns related to residents moving closer to transit would be broadly distributed throughout the regional study area because of the wide variety of factors that influence a household's decision about where to live. In addition, in areas to which people might move to avoid the toll or be close to transit, the value of residential property and rents is already influenced by the existing proximity to transit. While there could be some additional value to living close to transit (i.e., the value of living near a commuter station) in the future with the CBD Tolling Alternative, there is value to such proximity under existing conditions. The CBD Tolling Alternative itself would not introduce a new residential amenity that could substantively alter rents. Within the Manhattan CBD in particular, residential property values are already well established and influenced by factors such as the area's central location in New York City and its proximity to transit. While some research indicates that a reduction in traffic congestion resulting from congestion pricing could increase residential sales prices and thus could exert upward pressure on rents,<sup>28</sup> the potential social, economic, and environmental benefits from the CBD Tolling Alternative—some of which are detailed in other subsections of this subchapter—would not be substantial enough to markedly influence rents or residential property market conditions given the other factors already influencing New York City's residential real estate market (i.e., its central location and proximity to transit, jobs, cultural amenities, etc.).

Moreover, the substantial number of apartments in the Manhattan CBD that have protected rents (e.g., apartments under the jurisdiction of the New York City Housing Authority and apartments that are protected by New York State's rent control and rent stabilization laws) would not be subject to market-driven prices increases.<sup>29</sup> Furthermore, the Manhattan CBD already has the highest cost of living and highest home prices and rents in the region, and it is unlikely that many individuals would seek to move to the Manhattan CBD specifically to avoid the toll or because of a reduction in congestion. Therefore, the CBD Tolling Alternative would not substantively affect population characteristics of the Manhattan CBD or other transit hubs by attracting new residents seeking to avoid the toll.

**1** Furthermore, as discussed in **Chapter 6, "Economic Conditions,"** the cost of new tolls with the CBD Tolling Alternative would not be likely to result in an appreciable increase in the cost of goods within the Manhattan CBD. In addition, as noted earlier, residents whose primary residence is inside the Manhattan

<sup>28</sup> A study of conditions in London found that reductions in traffic in the congestion zone increased residential sales prices in the congestion zone. Tang, Cheng Keat. 2018. "Essays in the economics of transportation, housing and discrimination." PhD thesis, The London School of Economics and Political Science. [theses.lse.ac.uk/3797/](https://theses.lse.ac.uk/3797/).

<sup>29</sup> Estimates of protected units in the Manhattan CBD are not available, but approximately 58 percent of the renter-occupied households in New York City reside in protected housing units (i.e., housing units that are rent stabilized, rent controlled, public housing, Mitchell-Lama rental, or subject to HUD or other regulation) with a substantial proportion of these units in Manhattan. Source: Waickman, C. R., Jerome, J. B. R., Place, R. *Sociodemographics of Rent Stabilized Tenants*. New York City Department of Housing Preservation and Development. 2018. [www1.nyc.gov/assets/hpd/downloads/pdfs/services/rent-regulation-memo-1.pdf](https://www1.nyc.gov/assets/hpd/downloads/pdfs/services/rent-regulation-memo-1.pdf).

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Given the increased cost for goods, rents and everything else we have to pay for, this should be re-evaluated as this is inaccurate and making a large assumption without the data support.

toll and others would not.) Tolling Scenarios B and F would result in lesser effects on services that provide or rely on truck deliveries since they limit the number of times a truck would be charged the CBD toll on a given day. At the same time, community facilities and services that rely on vehicle travel into and out of the Manhattan CBD would benefit from a less congested roadway network.

One example of a community service that may incur additional cost related to the toll is school bus service to and from school across the Manhattan CBD boundary at 60th Street. As described earlier, most students in Manhattan travel to and from school by walking, biking, or public transit. For the school bus operations that occur, the CBD Tolling Alternative would increase the cost of some bus services for NYCDOE if all school buses are not exempt from the toll. (Those school buses carrying students with disabilities would be exempt from the toll under the legislation that created the CBD Tolling Program.) The City of New York would need to set aside funding for this cost, competing with other resource needs.<sup>30</sup> Whether school buses receive an exemption or not, they would still benefit from reduced roadway congestion and additional funds to improve transit service used by their faculty, staff, and students.

### *Costs to People who Visit Community Facilities and Services*

Throughout the regional study area, most community facilities are locally focused, serving their individual communities, although some have a larger regional draw. Most community facilities and services in the Manhattan CBD are close to transit services, making this a viable mode choice for access to those community facilities and, as noted earlier, most travel to and from the Manhattan CBD is by transit. The clientele who use transit would not have increased costs. There would be a cost with the CBD Tolling Alternative to people who drive to community facilities and services in the Manhattan CBD from outside the Manhattan CBD and also to residents of the Manhattan CBD who drive to community facilities outside the Manhattan CBD.

**1** Examples of the type of community facility user who would be affected by the cost of the toll if they drive would be individuals traveling to medical or healthcare facilities, or potentially to a place of worship. These examples are discussed below. As noted in **Chapter 17, “Environmental Justice,”** and **Chapter 18, “Agency Coordination and Public Participation,”** members of the public raised the increased cost of travel for patients traveling to health care facilities in the Manhattan CBD as a concern during early public outreach conducted in fall 2021.

<sup>30</sup> Private schools using buses that pay the CBD toll would have to absorb the costs or pass them on to their students if buses are tolled; in Tolling Scenarios B and F, school buses would be exempt from the toll and in the other tolling scenarios they would be subject to the toll with no cap or exemption.

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Senior centers, day cares and schools need to be considered and reviewed for the public safety concerns. A study for Battery Park should be done.

Overall, given the wide range of travel options other than driving, the cost for users to drive to community facilities and services would not constitute an adverse effect on the operations of community facilities and services.

### *Costs to Workers at Community Facilities and Services*

Workers at community facilities and services, such as teachers, police officers, or health care workers, may choose to commute by automobile to or from the Manhattan CBD because their work schedule is not conducive for transit use, because they have limited transit options to their place of work, or, in some cases, because they have free parking at their place of work. With the CBD Tolling Alternative, there would be a cost to workers associated with commuting by vehicle if they enter or remain in the Manhattan CBD.

As discussed in more detail in **Chapter 6, “Economic Conditions,”** as a result of the CBD Tolling Alternative, such workers would make one of the following decisions: (1) continue to commute by vehicle and incur the toll cost; (2) switch modes to a nonvehicular option before entering the Manhattan CBD to avoid the toll cost; (3) seek new employment opportunities (or other workplace locations with the same employer) at locations that would not involve incurring the toll; (4) relocate their place of residence to the Manhattan CBD; or (5) telecommute, or telecommute more often, to eliminate or reduce the frequency of incurring the toll. Workers that make decision (1), (2), (4), or (5) or seek other workplace locations with their same employer in decision (3) would continue employment at their respective community facility or service employer, and thus would not affect the provision of community facilities or services. These workers would not result in additional costs to their employers because they would either absorb or avoid the toll. It should be noted that decisions (4) and (5) may not be feasible for many workers at community facilities and services. For decision (4), the potential cost savings associated with eliminating a toll would be far outweighed by other cost-of-living and quality-of-life factors given the relatively high rents and home prices within the Manhattan CBD. For decision (5), telecommuting is not a viable option for many types of work, including many types of community facilities and services work.

Many workers at community facilities and services in the Manhattan CBD would have the option to switch from a vehicle to transit to their place of work because the Manhattan CBD is accessible by transit with a range of modes and service providers, including local and express subways, commuter and intercity rail, local and express buses, intercity buses, and ferries. As noted in **Chapter 6, “Economic Conditions,”** the ease of transit access within the Manhattan CBD allows the subset of Manhattan CBD car commuters who would be discouraged by toll costs and who do not have transit access near their homes, to instead drive to a transit station and complete their commute by transit. As noted earlier, all areas of the Manhattan CBD are within one-half mile of transit service, but one area in the West 50s is not within one-half mile of faster transit modes. As shown in **Table 6-11** in **Chapter 6, “Economic Conditions,”** approximately 0.7 percent of all jobs (or 1,415 jobs) in the Manhattan CBD in the “Education, health, and social services” industry category and approximately 0.1 percent of all jobs (or 65 jobs) in the “Public administration,” industry category are located more than one-half mile from faster transit at a subway station or express/SBS bus stop. Furthermore, more than 85 percent of jobs in the Manhattan CBD are held by workers who commute by public transportation; approximately 9 percent of Manhattan CBD jobs are held by workers who drive to work alone.

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Have we assessed Battery Park City and the impact on workers commuting from Battery Park City at non-peak hours such as early in the morning or late at night (for example, doctors, health care workers, etc)?



To the extent that some community facilities and services workers who currently drive to work in the Manhattan CBD would seek new employment (i.e., decision (3) above), this would likely happen over time (for example, as people try new modes of transportation to avoid the toll and perhaps ultimately decide to take a new job elsewhere) such that services would be maintained and, if necessary, employers could elect to provide incentives (such as higher pay or reimbursements) to compensate for the cost of the toll to workers. The cost of higher pay for workers in the Manhattan CBD would increase operating costs for the community facility or service provider.

### ***Emergency Response Times***

The CBD Tolling Alternative would result in potential changes in traffic patterns, including potential increases in traffic at some locations, which could affect emergency response times. Shifts in traffic patterns would change conditions at some local intersections within and near the Manhattan CBD. Of the more than 102 local intersections analyzed, most intersections would see reductions in or no change in delay. At intersections where the CBD Tolling Alternative would result in increases in delay, the Project will include implementation of signal-timing adjustments to address that delay. Therefore, the increases in delays at local intersections would not adversely affect emergency response times.

Under Tolling Scenarios D, E, and F, the CBD Tolling Alternative would result in increased traffic volumes approaching the Manhattan CBD on the Long Island Expressway (I-495) leading to the Queens-Midtown Tunnel and the Trans-Manhattan Expressway (I-95) between the Alexander Hamilton Bridge and the George Washington Bridge during the midday and PM peak hours. Although there would be some increase in overall travel time at these locations under these tolling scenarios, emergency response vehicles are not bound by standard traffic controls when responding to emergencies and thus may be able to bypass some highway congestion. Therefore, the increased volumes on certain highway segments would not adversely affect emergency response times. The CBD Tolling Alternative would contribute to improved response times in the Manhattan CBD because it would reduce vehicular congestion in the Manhattan CBD.

#### **5A.4.2.4 EFFECTS ON VULNERABLE SOCIAL GROUPS**

This section evaluates the Project's potential effects on certain vulnerable social groups, including elderly populations, persons with disabilities, transit-dependent populations, and nondriver populations. The potential effects of the CBD Tolling Alternative on minority and/or low-income populations is evaluated in Chapter 17, "Environmental Justice."

<sup>1</sup>This section draws on the summary of the potential benefits of the CBD Tolling Alternative provided earlier and includes subsections for each of the relevant social groups.

### ***Elderly Individuals***

The CBD Tolling Alternative would result in an additional cost to elderly individuals if they travel by auto and enter or remain in the Manhattan CBD. Some elderly people would shift to other modes to avoid the toll, while others would continue to drive and pay the toll, because it is worth the time savings, because they prefer traveling by car, or because they have limited transportation options. The majority (approximately 63 percent) of the approximately 105,000 people age 65 or older who commute to

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Potential effects should be monitored or analyzed for all groups and not just low income. Environmental justice should be for everyone and not just certain groups. This study needs to be done for the Battery Park neighborhood.

Manhattan for work take public transit, while approximately 18 percent drive or travel by taxi or FHV.<sup>31</sup> No information is available about travel mode choices for elderly individuals traveling to the Manhattan CBD for non-work-related reasons. As noted in **Chapter 17, “Environmental Justice,”** and **Chapter 18, “Agency Coordination and Public Participation,”** members of the public raised the increased cost of travel for elderly individuals in the Manhattan CBD as a concern during early public outreach conducted in fall 2021.

The costs incurred by elderly individuals driving to the Manhattan CBD would vary depending on how frequently they choose to drive to the Manhattan CBD and at what time of day. As noted earlier, driving to and from the Manhattan CBD is already expensive given the very limited availability of free or low-cost parking and the cost of taxi/FHV fares, and it is likely that people who drive frequently have higher incomes.<sup>32</sup> With the CBD Tolling Alternative, some elderly individuals would likely switch from vehicles to public transit for journeys to the Manhattan CBD, consistent with BPM data that indicate an overall reduction in driving mode share to the Manhattan CBD ranging from 4 percent (with Tolling Scenario B) to 10 percent (with Tolling Scenario E), or approximately 19,900 to 49,500 fewer daily driving journeys to the Manhattan CBD. **Table 4A-8 in Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling,”** provides more information on the predicted change in mode share to the Manhattan CBD.

There are various reasons that elderly people drive to the Manhattan CBD, including trips to work, trips to shop, dine, or attend a performance, trips to visit friends or family, and trips to community facilities, including medical appointments. There is a transit alternative to reach many destinations within the Manhattan CBD, including local buses that stop within a block or two of most destinations. **People over the age of 65 with a qualifying disability receive a reduced fare on MTA subways and buses, and elderly individuals with a qualifying disability can also receive MTA’s paratransit service, including taxis and FHV’s operating on behalf of MTA to transport paratransit users.**<sup>33</sup> Elderly people who drive to or from the Manhattan CBD and are low-income would be entitled to the same mitigations and enhancements proposed for younger low-income populations with the CBD Tolling Alternative (see **Chapter 17, “Environmental Justice”**). Other elderly individuals who drive to the Manhattan CBD would pay the full toll.

Elderly individuals would benefit from the travel-time and reliability improvements to bus service with the CBD Tolling Alternative, as bus passengers tend to be older than riders on other forms of transit, such as the subway and, as described above, bus passengers in the Manhattan CBD would benefit from travel-time savings due to the decrease in congestion.<sup>34</sup>

### ***Persons with Disabilities***

With the CBD Tolling Alternative, qualifying vehicles transporting people with disabilities would be exempt from the toll. As currently *[defined]*, qualifying vehicles transporting persons with disabilities includes vehicles with government-issued disability license plates and fleet vehicles owned or operated by

<sup>31</sup> Data on mode of travel to work by age to the Manhattan CBD is not available. Data is available only to the county level.

<sup>32</sup> FHWA. Status of the Nation’s Highways, Bridges, and Transit Conditions & Performance, 23rd Edition. Chapter 3, “Travel.” Last accessed March 21, 2022. <https://www.fhwa.dot.gov/policy/23cpr/chap3.cfm#access-to-vehicles>.

<sup>33</sup> MTA has specific criteria to define qualifying individuals: <https://new.mta.info/fares/reduced-fare> and <https://new.mta.info/accessibility/paratransit/how-to-apply-or-recertify-for-access-a-ride>.

<sup>34</sup> [blog.tstc.org/2014/04/11/nyc-bus-riders-tend-to-be-older-and-poorer-than-subway-riders/](http://blog.tstc.org/2014/04/11/nyc-bus-riders-tend-to-be-older-and-poorer-than-subway-riders/).

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This statement needs to be evaluated as it pertains to the Battery Park City's elderly residents. The MTA options are not as available as this document outlines and, in emergency situations, could be a life threatening issue.

organizations used exclusively to provide transportation to people with disabilities. Therefore, disabled people traveling by a qualifying vehicle to or within the Manhattan CBD would not be charged a toll. Access-A-Ride paratransit service, which provides public transportation for customers with disabilities or certain qualifying health conditions, would be also exempt from the toll. Some disabled people may rely on travel by nonqualifying vehicles to or within the Manhattan CBD. In that case, the CBD Tolling Alternative would increase the cost for disabled people using nonqualifying vehicles to travel to the Manhattan CBD. As noted earlier, some of the cost to use nonqualifying vehicles for nonemergency medical transportation may be covered by Medicaid in certain situations. As noted in **Chapter 17, “Environmental Justice,”** and **Chapter 18, “Agency Coordination and Public Participation,”** members of the public raised the increased cost of travel for persons with disabilities in the Manhattan CBD as a concern during early public outreach conducted in fall 2021.

The CBD Tolling Alternative would provide benefits to improve paratransit services, such as reduced roadway congestion and travel-time improvements, which would benefit persons with disabilities.

Given the exemption from the toll for qualifying vehicles and the transit and paratransit service improvements, the CBD Tolling Alternative would not adversely affect persons with disabilities.

#### **1** *Transit-Dependent Populations and Nondriver Populations*

The CBD Tolling Alternative would benefit transit users in the region, and transit-dependent populations in particular, by creating a new funding source for MTA’s 2020–2024 Capital Program and subsequent programs. As described earlier, the CBD Tolling Alternative would result in a mode shift to transit across the region, but this mode shift would not result in adverse effects to the capacity of transit services serving the Manhattan CBD (refer to **Subchapter 4C, “Transportation: Transit”**). Furthermore, the CBD Tolling Alternative would not have unmitigated adverse effects on pedestrian facilities (such as sidewalks and crosswalks) that nondriver populations may rely on, and would result in safety benefits for pedestrians and bicyclists as described earlier. Therefore, potential transit ridership increases due to the CBD Tolling Alternative would not adversely affect transit-dependent populations or nondriver populations.

#### **2** **A.4.2.5 ACCESS TO EMPLOYMENT**

This subsection evaluates the effects of the new CBD toll on access to employment, including for people who travel from elsewhere to jobs in the Manhattan CBD and for residents of the Manhattan CBD who travel to jobs outside the Manhattan CBD.

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This study needs to be comprehensive and include residents of Battery Park. Not all transport vehicles for persons with disabilities will have the right permit or pass to obtain this exemption.



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Please clarify. Was BPC taken into account in this analysis? It does not appear that the analysis on the CBD and proposed congestion pricing has taken into account BPC.

*Changes to Daily Work Journeys to the Manhattan CBD*

**Table 5A-6** and **Table 5A-7** present the number of daily work journeys into the Manhattan CBD from each of the counties in the regional study area for each tolling scenario in comparison to the No Action Alternative. As shown, while the total number of daily work journeys would remain essentially the same (because the number of jobs would be unchanged; the small differences in total journeys are due to rounding in the model results), the distribution of the journeys would change with implementation of the CBD Tolling Alternative.

**1** The CBD Tolling Alternative would result in small shifts in the place of origin for employees with jobs in the Manhattan CBD. More employees would come from New Jersey (a 1.3 to 2.9 percent increase, depending on the tolling scenario), Staten Island (a 2.3 to 3.7 percent increase depending on the tolling scenario), and Long Island (a 1.4 to 2.6 percent increase, depending on the tolling scenario). Fewer employees would come from New York counties north of New York City, with a decrease of 1.7 percent under Tolling Scenario A (a decrease of approximately 1,800 work journeys); Queens, with a decrease of 1.5 percent under Tolling Scenario F (decrease of approximately 3,800 work journeys); the Bronx (a decrease of 1.4 percent under Scenario E); and Brooklyn (a decrease of 1.2 percent under Tolling Scenario E). The largest percentage decrease in daily work journeys to the Manhattan CBD would occur from Connecticut, with a decrease of 2 percent under Tolling Scenario E (a decrease of approximately 1,100 work journeys). These decreases indicate a decrease in jobs held at locations inside the Manhattan CBD by residents of the Bronx, Brooklyn, and Queens; New York counties north of New York City; and Connecticut.

*Change in Daily Work Journeys to Non-CBD Locations*

**Table 5A-8** and **Table 5A-9** show the projected change in daily work journeys to locations outside the Manhattan CBD for each county in the regional study area for each tolling scenario. Similar to the work journeys to the Manhattan CBD discussed above, the total number of daily work journeys to non-CBD locations would remain essentially the same (because the number of jobs would be unchanged; the small differences in total journeys are due to rounding in the model results), the distribution of the journeys would change with implementation of the CBD Tolling Alternative.

As shown, the modeling predicts that the number of Manhattan CBD residents who work outside the Manhattan CBD would decrease by up to 2.2 percent under the tolling scenario with the largest decrease (Tolling Scenario E, with a decrease of approximately 800 daily journeys). Specifically, with the No Action Alternative and all tolling scenarios of the CBD Tolling Alternative, approximately 37,000 daily work journeys would originate in the Manhattan CBD bound for locations outside the Manhattan CBD, compared to approximately 165,000 daily work journeys that would originate in the Manhattan CBD and remain there (see **Table 5A-6**). The reduction under Tolling Scenario E could be due to residents of the Manhattan CBD taking jobs within the Manhattan CBD vacated by non-Manhattan CBD residents who were working in the Manhattan CBD, but who took jobs outside of the Manhattan CBD to avoid the toll.

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Battery Park was not included in this study and needs to be properly assessed.



Work journeys originating in Manhattan north of 60th Street and bound for locations other than the Manhattan CBD would increase by approximately 1 percent compared to the No Action Alternative under all tolling scenarios. Similarly, work journeys from Brooklyn, Queens, and the Bronx to non-CBD locations would increase slightly under all tolling scenarios compared to the No Action Alternative. As noted previously, the BPM assumes regional employment would stay the same under the No Action Alternative and the CBD Tolling Alternative. Thus, the increases in work journeys to non-CBD locations from Manhattan north of 60th Street, Brooklyn, Queens, and the Bronx would directly offset (in terms of number of journeys) the decreases in work journeys to the Manhattan CBD shown in **Table 5A-7**. Likewise, the decreases in daily work journeys to locations outside of the Manhattan CBD originating in New Jersey or Long Island under each tolling scenario would be directly offset by the increases in work journeys to the Manhattan CBD shown in **Table 5A-7**.

### **1 Potential Effects on Access to Employment**

Approximately 1.4 million daily work journeys would travel into the Manhattan CBD from outside the CBD under any tolling scenario (see **Table 4A.2-10** in **Appendix 4A.2, “Transportation: Travel Forecast Scenario Summaries and Detailed Tables,”** and approximately 17 percent of these work journeys would be by driving (either the drive alone, high-occupancy vehicle, or taxi/FHV modes) compared to approximately 18 percent under the No Action Alternative. Although the share of total work journeys by driving would be similar under the No Action Alternative and CBD Tolling Alternative, the number of work journeys by driving modes to and within the Manhattan CBD would decrease by 4 to 10 percent (or 11,800 to 27,000 fewer driving journeys), depending on the tolling scenario (see **Table 6-23** in **Chapter 6, “Economic Conditions”**). Many of these workers, particularly those coming from other areas of New York City, would have transit access to the Manhattan CBD, but they might choose to drive despite the Manhattan CBD toll (for example, because they value the travel-time savings and convenience of driving, or they have work hours that are less conducive for transit).

As noted previously and shown in **Figure 5A-3**, a small portion of New York City does not have convenient access to faster transit modes (commuter rail, subway, or express bus/SBS bus service), although all of the city other than one neighborhood is within one-half mile of transit including local bus service. Approximately 5,200 people currently commute to the Manhattan CBD by car from these areas; as discussed previously, these car commuters are widely distributed throughout the city. For workers in these areas, some commuters could choose to drive instead to a transit hub if parking is available there (see **Subchapter 4D, “Transportation: Parking”**), and others could opt to use local bus service to access commuter rail, subway, or express bus/SBS service. **2** As noted previously, the CBD Tolling Alternative would also result in beneficial effects from the reduction in VMT and enhanced mobility that would result from reduced congestion, which would potentially offset the negative effect of increasing the cost of driving to the Manhattan CBD.

In addition, with the CBD Tolling Alternative, some car commuters with destinations outside the Manhattan CBD who use routes that pass through the Manhattan CBD to their destinations might choose a different route to avoid the CBD toll. This routing decision would be based on consideration of the cost of the toll versus the cost of the alternative routing, which could be a longer distance or more time-consuming. These

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What is the economic impact for those individuals who might lose their employment because they cannot afford these additional charges? Has BPC been considered in this analysis?



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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

commuters would still reach their destination and some drivers might use a different route than they do today. With the CBD Tolling Alternative, the number of work journeys to the Manhattan CBD originating from New Jersey and Long Island is projected to increase, and those bound for the Manhattan CBD from Brooklyn, Queens, the Bronx, and Manhattan outside the Manhattan CBD are projected to decrease. These decreases in work journeys to the Manhattan CBD are projected to be offset by increases in work journeys to non-CBD locations, which suggests that the CBD Tolling Alternative would result in small shifts in employment patterns (i.e., generally a change of 2 percent or less as shown in **Table 5A-7**). Furthermore, the regional study area has a dynamic economy with many employment opportunities across the region. Of the region's total employment of approximately 10.7 million jobs, 1.5 million are in the Manhattan CBD.

**1**his demonstrates that ample employment opportunities exist outside the Manhattan CBD for those who choose not to travel to the Manhattan CBD for work.

With respect to Manhattan CBD reverse commuters, the BPM results indicate that, in the aggregate, approximately 37,000 daily work journeys would originate in the Manhattan CBD bound for locations outside the Manhattan CBD with both the No Action Alternative and the CBD Tolling Alternative in all tolling scenarios, and approximately 31 percent to 33 percent of these work journeys (or 11,600 to 12,200) would be by the drive alone, high-occupancy vehicle, or taxi/FHV modes to places of work outside the Manhattan CBD under any tolling scenario, compared to 33 percent with the No Action Alternative. In the tolling scenario with the greatest change in work journeys made to places of work outside the Manhattan CBD (Tolling Scenario E, with a decrease of 835 journeys), the CBD Tolling Alternative would result in up to a 2.2 percent decrease in the number of work journeys from the Manhattan CBD to locations outside the Manhattan CBD compared to the No Action Alternative, which indicates a small effect on overall employment access for residents of the Manhattan CBD. This indicates the small likelihood that Manhattan CBD residents would change job locations from someplace outside the Manhattan CBD to a location within the Manhattan CBD because of the CBD Tolling Alternative. Most Manhattan CBD residents that currently work outside the Manhattan CBD would continue to do so as a result of the CBD Tolling Alternative.

Overall, the CBD Tolling Alternative would not adversely affect access to employment for residents of the regional study area and would not adversely affect social groups or population characteristics of the regional study area. Commuters who travel (by any mode) to, from, or within the Manhattan CBD to access employment would benefit from the reduced congestion resulting from the CBD Tolling Alternative. Furthermore, by creating a new funding source for the MTA 2020–2024 Capital Program and subsequent capital programs, the CBD Tolling Alternative would benefit commuters who use MTA transit services to access employment.

## **2A.5 CONCLUSION**

Transportation users in the region would benefit from the CBD Tolling Alternative through travel-time savings, improved travel-time reliability, reduced vehicle operating costs, improved safety, reduced air pollutant emissions, and a predictable funding source for transit improvements. This would positively affect community connections and access to employment, education, healthcare, and recreation for residents.

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

All areas of New York City outside the Manhattan CBD have transit access to the Manhattan CBD and would not be isolated from community services or ties within the Manhattan CBD. Even with the robust transit accessibility between the Manhattan CBD, New York City, and the regional study area, however, some people would continue to drive to the Manhattan CBD with the new CBD toll in place. The costs incurred by individuals driving to the Manhattan CBD would vary widely, depending on individual circumstances and the specific tolling scenario. The greatest cost would be incurred by those who make frequent driving journeys to the Manhattan CBD during peak hours. Driving to and from the Manhattan CBD is already expensive given the very limited availability of free or low-cost parking and the cost of off-street parking or taxi/FHV fares, and it is likely that people who drive regularly have higher incomes. Individuals who drive less frequently would incur lower costs because of the toll. <sup>1</sup> Once the majority of trips to and from the Manhattan CBD are made by transit, most people would not be affected, and community cohesion would not be adversely affected. *[The Project Sponsors have committed to a package of mitigation measures to address potential adverse effects on low-income drivers who have no reasonable alternatives to reach the Manhattan CBD, which are described in Chapter 17, "Environmental Justice."]*

The CBD Tolling Alternative does not require the acquisition of any private property or occupied structure and therefore would not result in direct residential displacement. Given the myriad of factors that influence real estate costs in the region, the new CBD toll would not have a substantial effect on housing values either in the Manhattan CBD or in other residential neighborhoods near transit. As a result, indirect displacement resulting from the CBD Tolling Alternative would not occur.

Throughout the region, most community facilities and services serve their individual communities and, as a result, the potential effects of the Project on local community facilities would be limited. Nonetheless, a variety of community facilities and services, such as food pantries and meal delivery services, religious facilities, cultural institutions, social service providers, and home healthcare providers, rely on vehicles to transport people, goods, services, supplies, or staff into and out of the Manhattan CBD. Community service providers that are not exempt from the toll and do not have other travel options would have to absorb the cost of the toll. Given the wide range of travel options other than driving, the cost for users to drive to community facilities and services would not constitute an adverse effect on community facilities and services. Workers at community facilities and services, such as teachers, police officers, or health care workers, who currently choose to commute by automobile to or from the Manhattan CBD would have a new cost that may or may not be reimbursed by their employer, but most of these workers have the option to switch from a personal vehicle to transit to their place of work.

The CBD Tolling Alternative would result in potential changes in traffic patterns, including potential increases in traffic at some location. The analysis concludes that neither the increases in delay at local intersections nor the increased volume on certain highway segments would adversely affect emergency response times.

The CBD Tolling Alternative would result in an additional cost to elderly individuals if they travel by auto to and from the Manhattan CBD. Some elderly people would shift to other modes to avoid the toll. Elderly people with a qualifying disability could receive reduced fares on MTA subways and buses or could qualify

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis.  
Please clarify.

for MTA paratransit services, which are exempt from the toll. Low-income elderly individuals would benefit from the mitigation measures and enhancements identified for low-income drivers in general.

With the CBD Tolling Alternative, qualifying vehicles transporting people with disabilities would be exempt from the toll, as would paratransit service. Some disabled people may rely on travel by nonqualifying vehicles to or within the Manhattan CBD, and in that case, the CBD Tolling Alternative would increase the cost for those disabled people.

<sup>1</sup>The CBD Tolling Alternative would impose tolls on vehicles entering or remaining in the Manhattan CBD, which could affect individuals who currently drive to work. The number of work trips by driving modes to and within the Manhattan CBD would decrease with the Project, with an offsetting increase in transit travel. Those who continue to drive despite the CBD toll would do so based on the need or convenience of driving and would benefit from the reduced congestion in the Manhattan CBD. Some workers may also choose to forego their work trip to the Manhattan CBD and find other employment and other workers would choose to take on those jobs. The regional study area has a dynamic economy with many employment opportunities spread across the region. Overall, the CBD Tolling Alternative would not adversely affect access to employment for residents of the regional study area.

<sup>2</sup>Table 5A-10 provides a summary of the effects of the CBD Tolling Alternative related to population characteristics and community cohesion.

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Table 5A-10. Summary of Effects of the CBD Tolling Alternative on Population Characteristics and Community Cohesion

| TOPIC                             | SUMMARY OF EFFECTS  | EFFECT FOR ALL TOLLING SCENARIOS  | POTENTIAL ADVERSE EFFECT | MITIGATION AND ENHANCEMENTS  |
|-----------------------------------|---|---|--------------------------|--|
| Benefits                          | Benefits in and near the Manhattan CBD  | 1 Benefits in and near the Manhattan CBD related to travel-time savings, improved travel-time reliability, reduced vehicle operating costs, improved safety, reduced air pollutant emissions, and predictable funding source for transit improvements. This would positively affect community connections and access to employment, education, healthcare, and recreation for residents.  | No                       | No mitigation needed. Beneficial effects   |
| Community Cohesion                | Changes to travel patterns, including increased use of transit, resulting from new toll   | Changes to travel patterns, including increased use of transit, as a result of the Project would not adversely affect community cohesion or make it more difficult for people to connect with others in their community, given the extensive transit network connecting to the Manhattan CBD and the small change in trips predicted.   | No                       | No mitigation needed. No adverse effects. See Chapter 17, "Environmental Justice," for mitigation related to increased costs for low-income drivers. |
| Indirect Displacement             | No notable changes in socioeconomic conditions or cost of living so as to induce potential involuntary displacement of residents in the Manhattan CBD       | The Project would not result in the potential for indirect (involuntary) residential displacement. It would not result in substantial changes to market conditions so as to lead to changes in housing prices, given that real estate values in the Manhattan CBD are already high and the many factors that affect each household's decisions about where to live. In addition, low-income residents of the CBD would not experience a notable increase in the cost of living as a result of the Project because of the lack of change in housing costs, the many housing units protected through New York's rent-control, rent-stabilization, and other similar programs, the tax credit available to CBD residents with incomes of up to \$60,000, and the conclusion that the cost of goods would not increase as a result of the Project). | No                       | No mitigation needed. No adverse effects   |
| Community Facilities and Services | Increased cost for community facilities and service providers in the Manhattan CBD, their employees who drive, and clientele who drive from outside the CBD | The Project would increase costs for community service providers that operate vehicles into and out of the Manhattan CBD and for people who travel by vehicle to community facilities and services in the Manhattan CBD, as well as residents of the CBD and employees of community facilities who use vehicles to travel to community facilities outside the CBD. Given the wide range of travel options other than driving, the cost for users to drive to community facilities and services would not constitute an adverse effect on community facilities and services.   | No                       | No mitigation needed. No adverse effects   |

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Battery Park City would be adversely impacted from the increased traffic and pollution (air, noise, etc.). Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

## 5B. Neighborhood Character

### 5B.1 INTRODUCTION

Neighborhood character is an amalgam of various character-defining features of an area. This subchapter describes the analysis of effects of implementing the CBD Tolling Alternative on neighborhood character, relying on the result of the traffic, transit, pedestrians and bicyclists, economic considerations, parklands, historic and cultural resources, visual resources, air quality, and noise analyses prepared for this EA.

### 5B.2 METHODOLOGY

#### *5B.2.1 Framework for Neighborhood Character Analysis*

Neighborhood character is the mix of the various elements that give neighborhoods their distinct personality, context, and feeling. Neighborhood character consists of the attributes, including social and economic characteristics, and assets that make a neighborhood unique and that establish a sense of place for residents, workers, and visitors. Changes in travel patterns can affect neighborhood character by resulting in a notable change in vehicular and/or pedestrian traffic in an area or a related change in vehicle noise or air quality, if that change in turn affects a defining feature of the area's neighborhood character.

Neighborhood character is distinct from community cohesion, which is the degree to which groups of people with shared attributes or affinities—such as cultural, religious, artistic, or activity-based communities—form and maintain communities that are not limited to any location or neighborhood. Project effects on community cohesion are discussed in **Subchapter 5A, "Social Conditions: Population Characteristics and Community Cohesion."**

#### *5B.2.2 Study Areas*

This subchapter considers whether the CBD Tolling Alternative would affect neighborhood character at a local level by introducing changes in travel behavior that could in turn affect defining features of neighborhood character. The analysis considers the potential effects that would occur in neighborhoods where BPM results indicate that Project-related changes in travel behavior would occur: the Manhattan CBD; at and close to 60th Street; near neighborhood streets where vehicular traffic would increase because of the Project; and at transit hubs where vehicular and/or pedestrian activity would increase because of the Project. The study areas for this assessment include the following:

- **1 Manhattan CBD Study Area** – This study area includes the portion of Manhattan inclusive of and south of 60th Street from the Hudson River to the East River.<sup>1</sup>

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<sup>1</sup> For the purposes of the analysis in this subchapter, the Manhattan CBD study area includes the West Side Highway/Route 9A and the FDR Drive because these roadways are within and form part of the neighborhood context of the Manhattan CBD. However, vehicles that travel exclusively on these roadways would not be subject to the Manhattan CBD toll.

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis.  
Please clarify.

- **60th Street Manhattan CBD Boundary Study Area** – 60th Street is the only segment of the Manhattan CBD boundary that is adjacent to neighborhoods outside the Manhattan CBD (elsewhere, the boundary is defined by the Hudson and East Rivers and New York Harbor). Because a new toll would be implemented between neighborhoods where no toll exists today, an analysis of potential effects on the neighborhood character of this area is merited. This study area includes the section of Manhattan between 55th and 65th Streets from the Hudson River to the East River, overlapping with a portion of the Manhattan CBD study area. This study area at the border of the Manhattan CBD is included for consideration of changes in travel behavior that could occur near the edge of the Manhattan CBD following implementation of the CBD Tolling Alternative and their potential for localized effects on its neighborhood character.

The study area is limited to five blocks on either side of the Manhattan CBD boundary because while changes in transportation activity near the 60th Street Manhattan CBD boundary could be spread out over a broader area, this analysis makes the conservative assumption that the changes would be more concentrated (and therefore more intense) in the five blocks on either side of 60th Street and could have the potential to adversely affect neighborhood character.

In addition to the two study areas described above, the following areas where changes in transportation activity would result from Project implementation were also considered. For the reasons explained below, there is no potential for Project implementation to adversely affect neighborhood character in these areas, and no further analysis of these study areas was warranted.

- **Neighborhood Streets and Highways Experiencing Increases in Traffic** – The CBD Tolling Alternative would result in an overall net reduction in auto journeys to and from the Manhattan CBD. Depending on the tolling scenario, certain local streets and highway segments are projected to experience increases in vehicle traffic from route diversions. (Subchapter 4B, “Transportation: Highways and Local Intersections,” identifies these local streets and highways.) The concern for neighborhood character on these neighborhood streets and highways is whether this increased vehicular traffic could substantively burden the roadways in a way that could affect defining features of neighborhood character.<sup>2</sup> As described in Section 5B.4.3, changes in neighborhood character in neighborhoods where local streets and highways would experience increased traffic are not anticipated; therefore, specific study areas were not defined for this analysis.

<sup>1</sup> Some neighborhoods near these neighborhood streets and highways have large concentrations of minority and/or low-income populations, collectively “environmental justice populations,” who live in them. Chapter 17, “Environmental Justice,” describes these neighborhoods and evaluates the effects of the CBD Tolling Alternative on the environmental justice populations who live there.

- **Transit Hubs** – With the CBD Tolling Alternative, certain public transportation hubs would experience an increase in transit ridership as more travelers to and from the Manhattan CBD elect to take public transportation rather than personal transportation or taxis/FHVs to avoid the toll. (Subchapter 4C,

<sup>2</sup> This analysis relies on the impact determinations in Subchapter 4B, “Transportation: Highways and Local Intersections,” to determine whether roadways have been substantively burdened.

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Battery Park City will get impacted due to the increased traffic and pollution (air, noise, etc.). Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

“**Transportation: Transit,**” identifies the transit hubs.) The concern for neighborhood character at these transportation hubs is whether this increased travel activity could substantively burden<sup>3</sup> the roadways, parking facilities, and pedestrian elements in the immediate area of the transit hubs in a way that could affect defining features of neighborhood character, or whether the larger numbers of travelers accessing the transit hubs could cause changes in market forces near the transit hubs that could lead to displacement of businesses or residents in a way that would affect defining features of neighborhood character. As described in **Section 5B.4.3**, changes in neighborhood character near transit hubs are not anticipated; therefore, specific study areas were not defined for this analysis.

### 5B.3 AFFECTED ENVIRONMENT

**1** This section describes the existing neighborhood character of each study area.

#### 5B.3.1 *Manhattan CBD Study Area*

For the assessment in this subchapter, the Manhattan CBD study area is defined as the area of Manhattan south and inclusive of 60th Street. This area includes a heterogeneous mix of neighborhoods and serves as the economic hub of the New York City region (**Figure 5B-1**). This section broadly describes the character of the Manhattan CBD organized into three geographic areas—Lower Manhattan, Canal Street to 14th Street, and Midtown Manhattan north of 14th Street—following a traditional division of the Manhattan CBD into broad groupings of neighborhoods based on similarities in neighborhood character.

The Manhattan CBD has census block groups that house minority and low-income (collectively, “environmental justice”) populations. **Chapter 17, “Environmental Justice,”** evaluates the effects of the CBD Tolling Alternative on environmental justice populations.

#### **2** LOWER MANHATTAN


Lower Manhattan is the southern portion of the Manhattan CBD study area from the tip of Manhattan north to Canal Street. This area includes neighborhoods such as the Financial District, Battery Park City, Chinatown, Tribeca, and Civic Center, and falls within Manhattan Community District 1 and a portion of Community District 3.<sup>4</sup> The area’s built form is characterized by narrow streets in configurations that are not the typical Manhattan grid (e.g., the original colonial-era street configuration in the Financial District) and a varied mix of building forms that include low-rise, mid- to late-19th century buildings; turn-of-the-century and Art Deco skyscrapers; and tall, modern, brick and metal-and-glass skyscrapers, especially in the World Trade Center complex and Battery Park City. Land uses in the area include predominantly commercial and civic/government uses in the southernmost portions of Lower Manhattan, giving way to a more mixed-use, lower-density character with more residential, retail, open space, and light industrial uses

<sup>3</sup> This analysis relies on the impact determinations in **Subchapter 4C, “Transportation: Transit,” Subchapter 4D, “Transportation: Parking,”** and **Subchapter 4E, “Transportation: Pedestrians and Bicycles,”** to determine whether roadways, parking facilities, and pedestrian elements have been substantively burdened.

<sup>4</sup> New York City is divided into 59 community districts, a division of local governance. Each district is represented by a community board, a group of up to 50 unsalaried members selected by the area’s elected officials. Community boards serve an advisory role to address land use and community concerns within their districts and as a liaison between the public and the local government.

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From the face of the document, as Battery Park City was not reviewed, the statement is not accurate. Given Battery Park City's location, it is unique from other neighborhoods as it does not have a 24 hour train station in the neighborhood. Due to increase in crime, some residents have expressed that they use private transportation at certain hours of the day to ensure physical safety. Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

 Number: 2 Author: BPC Resident Subject: Highlight Date: 6/12/23, 10:32:01 AM

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Although BPC is mentioned here, there seems to be no specific analysis of BPC. Of concern is the impact of the increased congestion on West St, which will result in adverse impact to the environment through increased congestion, health issues for residents especially children and seniors, and pedestrian safety concerns due to increased congestion. Please clarify the level of review conducted with respect to BPC. Why aren't all neighborhoods reviewed? For purposes of environmental justice, why isn't NY County treated as one given the density of the population across a small area?



in the northern portions of Lower Manhattan. The area of Lower Manhattan south of Chambers Street has experienced a notable increase in residential use in recent decades, including conversion of prior office space into residential apartments. The Two Bridges neighborhood contains several public housing projects comprising thousands of affordable apartments.

**Figure 5B-1. View of the Manhattan CBD Looking North to Midtown Manhattan from One World Trade Center**



Source: Allison L. C. de Cerreño, 2022.

**1** Lower Manhattan includes neighborhoods with notable environmental justice populations—Two Bridges and the portions of the Chinatown and the Lower East Side neighborhoods below Canal Street. **Chapter 17, “Environmental Justice,” Section 17.5.2** provides more information on these neighborhoods.

Lower Manhattan contains the approaches and entrance ramps to four major river crossings: the Brooklyn Bridge, Manhattan Bridge, Holland Tunnel, and Hugh L. Carey Tunnel. Traffic is particularly heavy at the river crossing entrances and exits, and traffic is often congested due to the narrow streets and irregular street layout. Generally, pedestrian volumes are extremely heavy on weekdays (because of the area’s worker population) and lighter on weekends. Several major transportation hubs are located in Lower Manhattan and provide service connections to and between the subway system, the Port Authority Trans-Hudson (PATH) system, and ferry services. These include the PATH World Trade Center terminal; Fulton

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Battery Park City should be included as a neighborhood with environmental justice population - to include families and survivors of 9/11 fighting 9/11 diseases. We also surveyed neighbors who were concerned with this draft FONSI and noted that half of the respondents were persons of color.

Potential concerns for neighborhood character in the Manhattan CBD study area due to implementation of the CBD Tolling Alternative relate to whether changes in the number of people accessing the Manhattan CBD and economic effects on specific industries would have the potential to affect defining features of neighborhood character.

#### ***Changes in the Number of People Accessing the Manhattan CBD***

As described in **Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling,”** BPM results indicate that despite congestion reductions resulting from the Project, due to people shifting to other modes the overall number of daily journeys by all modes to, from, and within the Manhattan CBD study area would not change substantially because of the Project. The BPM has a limited ability to predict trip cancellation, and it is likely that some additional trips to the Manhattan CBD beyond those projected by the BPM would be canceled due to the implementation of the Project. **Subchapter 4A** notes that experience from similar program implementations in London and Stockholm shows that while some trip cancellation would occur, it would be a relatively small percentage of overall drivers accessing the Manhattan CBD (less than 3 percent in London and up to approximately 11 percent in Stockholm). Because only approximately 20 percent of all Manhattan CBD-related journeys are made by auto, cancellation of a small percentage of auto trips would not result in a significant decrease in total journeys by all modes. For example, in 2023 under Tolling Scenario B (the scenario with the highest number of Daily Manhattan CBD-related vehicle person- journeys, per **Table 4A-9** in **Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling,”**), if 11 percent of those journeys were cancelled altogether, this would result in a decline of 50,329 total CBD-related journeys; if 3 percent of those journeys were cancelled altogether, this would result in a decline of 13,726 total CBD-related journeys. In the context of the approximately 2.8 million total daily journeys to the Manhattan CBD in 2023 (see **Table 5A-2** in **Subchapter 5A, “Social Conditions: Population Characteristics and Community Cohesion,”**), this represents a small fraction of total journeys to the Manhattan CBD. With this small reduction in the overall number of people accessing the Manhattan CBD study area daily, the high levels of vehicular and pedestrian traffic, high density of development and intensity of use, and the prominence of large-scale transportation facilities that are defining characteristics of neighborhood character in the Manhattan CBD would not be affected. Therefore, the CBD Tolling Alternative would not adversely affect neighborhood character in the Manhattan CBD study area due to changes in the number of people accessing the Manhattan CBD.

As discussed in the previous paragraph, with the Project, pedestrian traffic in this area would likely increase due to mode shift away from automobiles, which could benefit land uses that rely on high levels of pedestrian traffic, particularly retail uses. This would reinforce the established patterns of land use, heavy mixing of uses, and the very high density of development and intensity of use that are defining features of neighborhood character in the Manhattan CBD study area.

#### ***Economic Effects on Specific Industries***

As noted in **Chapter 18, “Agency Coordination and Public Outreach,”** members of the public raised Project effects on small businesses as a concern during early public outreach conducted in fall 2021. **Chapter 6, “Economic Conditions,”** concludes that changes in travel patterns brought on by the CBD Tolling Alternative would not adversely affect any particular industry or occupational category in the Manhattan CBD,

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis.  
Please clarify.

described above also suggests that the demand for parking in those neighborhoods would not increase. However, members of the public have expressed concern that after implementation of the CBD Tolling Alternative, taxi/FHV drop-offs would increase just north of 60th Street and demand for the existing, limited supply of on-street parking north of 60th Street could increase, as people seek to avoid crossing the Manhattan CBD boundary in a vehicle and paying the toll. However, this is unlikely to occur given the difficulty in finding an available parking space in this area (see discussion in **Section 5B.3.2**). On-street parking is generally not a reliable source of parking in the 60th Street Manhattan CBD boundary study area. To have a reliable source of parking, commuters and other drivers who routinely access the Manhattan CBD from the north would likely seek a monthly space in a parking lot or garage; as discussed in **Section 5B.3.2**, costs for monthly spaces in this area range from approximately \$400 to over \$1,000 per month, which would offset the benefit of avoiding the toll. If any increase in parking demand or taxi/FHV drop-offs does occur in this area, it would likely decrease over time as people adjust their travel patterns to account for the toll. Particularly for those driving their personal vehicles, the complexity and wasted time associated with finding parking in this area would likely deter long-term shifts to parking just north of the 60th Street Manhattan CBD boundary. Any increase in demand for on-street parking would not affect most neighborhood residents, who are not likely to rely on on-street parking for their regular parking needs. It should be noted that ready access to on-street parking spaces is not a defining feature of neighborhood character in this area, and any limited changes to on-street parking availability that may occur as a result of Project implementation would therefore not have the potential to affect neighborhood character.

As described in **Chapter 6, “Economic Conditions,” Section 6.4.3.2**, if an increase in demand for off-street parking were to occur just north of the 60th Street Manhattan CBD boundary, that demand would be accommodated through available capacity, or if there were capacity constraints, it would be offset through upward adjustments in parking fees; this would likely offset potential changes in parking behavior resulting from the CBD Tolling Alternative. Between 60th and 65th Streets, there are 7,525 off-street parking spaces in 52 parking facilities, which under typical conditions are at 70 to 80 percent occupancy.<sup>9</sup> Of these, 3,865 spaces in 34 parking facilities are located east of Central Park, and 3,660 spaces in 18 parking facilities are located west of Central Park. For additional detail, see **Chapter 6, “Economic Conditions,” Table 6-33**. It is unlikely that new off-street parking capacity would be added just north of 60th Street because the area is built-out and lacks available sites, and a decades-long trend toward lower parking demand combined with high real estate values in this area further suggest that new parking garages would not be developed.

**1** With the CBD Tolling Alternative, neighborhood residents who live on one side of the Manhattan CBD boundary and park on the other, and who elect not to switch to a parking space on the same side of the Manhattan CBD boundary, would need to pay the toll each time they drive to their residence. This could add complexity to certain activities for those individual residents, such as dropping off purchases at a residence after a shopping trip. However, as noted, most residents do not have vehicles, and among those

<sup>9</sup> Based on a sampling of parking utilization collected in 2018 and 2019 during typical conditions for environmental review studies, weekday midday off-street parking utilization generally ranges from approximately 70 to 80 percent of capacity, with lower utilization rates in the AM and PM peak periods. Applying this utilization estimate to the total off-street parking capacity between 60th and 65th Streets (7,525 spaces) equates to between 1,505 and 2,258 available off-street parking spaces.

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis.  
Please clarify.



who do, most do not drive their vehicles in connection with shopping trips in this way. In addition, the New York City zoning code and CEQR guidance do not prioritize such activities in this section of Manhattan. New York City zoning does not require most developments in the 60th Street Manhattan CBD boundary study area to include off-street parking, and CEQR guidance generally does not consider project parking shortfalls in the 60th Street Manhattan CBD boundary study area to constitute an adverse impact due to the wide availability of transit and other alternative modes of transportation.

Any changes in driving behavior and access to parking would not adversely affect the defining features of neighborhood character in the 60th Street Manhattan CBD boundary study area. Because new parking garages are not likely to be developed in the place of existing uses, there would be no change in the mixed-use nature, established land use patterns, and high development densities that are defining features of the area's neighborhood character. Any increase in demand for parking would not affect the defining features of neighborhood character in the 60th Street Manhattan CBD boundary study area, because ready access to parking is not a defining feature of neighborhood character in this area.

### ***Economic Effects of Changes in Travel Patterns***

While the reductions in roadway traffic with the CBD Tolling Alternative would reduce congestion in the neighborhood, the 60th Street Manhattan CBD boundary study area would continue to experience heavy vehicular traffic overall given its major activity centers and its connections to the Ed Koch Queensboro Bridge, a major East River crossing. Pedestrian traffic would likely increase, which could benefit retail businesses in the neighborhood. Because the CBD Tolling Alternative would not substantially change the overall number of people using the neighborhood, it would not result in changes to the land use patterns that contribute to the character of the 60th Street Manhattan CBD boundary study area. Existing businesses in the 60th Street Manhattan CBD boundary study area would not be adversely affected, except potentially for off-street parking garages, which are discussed in the next paragraph (see **Chapter 6, "Economic Conditions,"** for further discussion of existing businesses).

As described in **Chapter 6, "Economic Conditions,"** demand for off-street parking could decrease in the blocks south of 60th Street after implementation of the CBD Tolling Alternative. This could lead to the redevelopment of existing parking garages with new replacement uses over time. The high property values in the neighborhood combined with existing zoning would ensure that replacement uses would be consistent with the types of uses already prevalent in the area, such as high-density commercial, residential, and institutional uses.

Therefore, the economic effects of changes in travel patterns would not adversely affect the mixed-use nature, prevailing land use patterns, high densities, and highly walkable nature that are defining features of neighborhood character in this area.

<sup>1</sup> Pedestrian traffic would likely increase in the 60th Street Manhattan CBD boundary study area, which could benefit retail businesses in the neighborhood, reinforcing the established patterns of land use that are a defining feature of the area's neighborhood character. Any redevelopment of existing parking garages could also benefit neighborhood character by introducing more active uses and higher densities that are more aligned with the defining features of the area's neighborhood character.

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*Effects on Central Park*

Central Park is closed to vehicular traffic except for park deliveries or other drivers with permitted business in the park; therefore, there would be no increase in the small number of vehicles that use the park roadways. The CBD Tolling Alternative would not result in any adverse effects on Central Park, such as changes in the use of the park or any reduction in usable parkland. The CBD Tolling Alternative (all tolling scenarios) would result in reduced traffic volumes adjacent to Central Park on Fifth Avenue and Central Park West as well as reduced traffic volumes crossing the park using the park's sunken transverse roads, which would be considered a beneficial effect on the park (see **Chapter 7, "Parks and Recreational Resources"**). Thus, the CBD Tolling Alternative would not adversely affect the character of Central Park, which is a defining feature of neighborhood character in the 60th Street Manhattan CBD boundary study area, and would result in beneficial effects to the park.

**1 NEIGHBORHOOD STREETS AND HIGHWAYS EXPERIENCING INCREASES IN TRAFFIC**

**Subchapter 4B, "Transportation: Highways and Local Intersections,"** provides analysis of highway segments and intersections in neighborhoods where changes in traffic would occur and concludes that with the implementation of standard traffic improvements, there would be no adverse traffic effects at local intersections. **Subchapter 4B** also concludes that through implementation of Transportation Demand Management measures, adverse traffic effects would be mitigated on highway segments where potentially adverse effects would result from increases in traffic volumes. As a result, with implementation of Transportation Demand Measures, there would be no substantial change to the overall operation or character of local streets or highways. Therefore, the CBD Tolling Alternative does not have the potential to alter neighborhood character near neighborhood streets or highways experiencing increases in traffic.

Many of the neighborhoods near these neighborhood streets and highways contain environmental justice populations. As noted in **Chapter 17, "Environmental Justice"** and **Chapter 18, "Agency Coordination and Public Outreach,"** during early public outreach conducted in the fall of 2021, members of the public raised concerns that traffic diversions to highways in Upper Manhattan and the Bronx with the CBD Tolling Alternative would adversely affect nearby neighborhoods with environmental justice populations, including by degrading air quality and increasing noise. Members of the public also voiced concerns about the effects of changes in traffic on the Lower East Side section of Lower Manhattan. **Section 17.6** provides a discussion of effects on environmental justice communities.

**TRANSIT HUBS**

As noted in **Section 5.B.2.2**, the concern for neighborhood character at transit hubs relates to whether increased travel activity resulting from the Project would substantively burden the roadways, parking facilities, and pedestrian elements in the immediate area of the transit hubs in a way that could affect defining features of neighborhood character, or whether the larger numbers of travelers accessing the transit hubs could cause changes in market forces near the transit hubs that could lead to displacement of businesses or residents in a way that would affect defining features of neighborhood character. **Subchapter 4C, "Transportation: Transit,"** **Subchapter 4D, "Transportation: Parking,"** and **Subchapter 4E, "Transportation: Pedestrians and Bicycles,"** conclude that the CBD Tolling Alternative would increase ridership at many transit stations, but it would not result in adverse effects to the operations of transit

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West St adjacent to Battery Park City will see increased traffic. This increase in traffic needs to be analyzed properly. Battery Park City needs to be included in this study and it does not appear to have been part of the analysis. Please clarify.

hubs. Subchapter 5A, “Social Conditions: Population Characteristics and Community Cohesion,” concludes that the CBD Tolling Alternative would not result in adverse effects from indirect residential displacement near transit hubs. Chapter 6, “Economic Conditions,” concludes that the CBD Tolling Alternative does not have the potential to substantively alter market conditions in neighborhoods surrounding transportation hubs. Therefore, given that the Project would not result in any effects at transit hubs, the CBD Tolling Alternative does not have the potential to alter neighborhood character near transit hubs.

## 5B.5 CONCLUSION

Table 5B-1 summarizes the effects of the Project.

Table 5B-1. Summary of Effects of the CBD Tolling Alternative on Neighborhood Character

| SUMMARY OF EFFECTS   | EFFECT FOR ALL TOLLING SCENARIOS   | POTENTIAL ADVERSE EFFECT | MITIGATION AND ENHANCEMENTS                     |
|--|--|--------------------------|---|
| No notable change in neighborhood character, including in the Manhattan CBD, in the area close to the CBD boundary, and the rest of the 28-county area | The changes in traffic patterns on local streets are unlikely to change the defining elements of the neighborhood character of the Manhattan CBD.  | No                       | <b>No mitigation needed.</b> No adverse effects |
|  | Changes in parking demand near the 60th Street CBD boundary (including increases just north of 60th Street and decreases just to the south) would not create a climate of disinvestment that could lead to adverse effects on neighborhood character nor alter the defining elements of the neighborhood character of this area. | No                       | <b>No mitigation needed.</b> No adverse effects |

<sup>1</sup>The Manhattan CBD study area serves as the economic hub of the New York City region and includes a heterogeneous mix of neighborhoods. The CBD Tolling Alternative would decrease vehicular trips within most parts of the Manhattan CBD and increase transit, bicycle, and pedestrian trips near transit stations. Due to people shifting to other modes the Project-related changes in the number of people accessing the Manhattan CBD would not substantially change and would not noticeably affect the intensity of use of the Manhattan CBD study area. Changes in travel patterns brought on by the CBD Tolling Alternative would not adversely affect any particular industry in the Manhattan CBD. Pedestrian traffic in this area would likely increase due to mode shift away from automobiles, which would benefit land uses that rely on high levels of pedestrian traffic, particularly retail uses. This, in turn, would reinforce the established patterns of land use, heavy mixing of uses, and the very high density of development and intensity of use that are defining features of neighborhood character in the Manhattan CBD study area.

The 60th Street Manhattan CBD boundary study area is a high-density mixed-use district containing portions of several neighborhoods as well as a section of Central Park. The CBD Tolling Alternative would not result in any adverse effects on Central Park, and traffic reductions on certain roadways adjacent to and within the park would result in beneficial effects to the park. This study area would be affected by changes in driving behavior related to access to parking; in addition, implementation of a congestion toll at 60th Street would add complexity for those neighborhood residents who currently drive in the area for errands and other activities. However, because new parking garages are not likely to be developed in the place of existing uses, there would be no change in the mixed-use nature, established land use patterns,

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Please clarify.

and high development densities that are defining features of the area. Any increased complexity in finding parking would not affect the defining features of neighborhood character because ready access to parking is not a defining feature of neighborhood character in this area. For these reasons, the CBD Tolling Alternative would not adversely affect the 60th Street Manhattan CBD boundary study area.

**1** The CBD Tolling Alternative would benefit neighborhood character in the 60th Street Manhattan CBD boundary study area. Pedestrian traffic would likely increase, which could benefit retail businesses in the neighborhood, reinforcing the established patterns of land use that are a defining feature of the area's neighborhood character. Any redevelopment of existing parking garages could also benefit neighborhood character by introducing more active uses and higher densities that are more aligned with the defining features of the area's neighborhood character.

**Subchapter 4B, "Transportation: Highways and Local Intersections,"** concludes that with the implementation of standard traffic improvements, there would be no adverse traffic effects at local intersections. It also concludes that through implementation of Transportation Demand Measures, adverse traffic effects could be mitigated on highway segments where traffic volumes would increase. While the CBD Tolling Alternative would affect traffic operations on local streets and highways in neighborhoods near the Manhattan CBD, there would be no substantial change to the overall operation or character of these local streets or highways, including on emissions and noise (see **Chapter 10, "Air Quality,"** and **Chapter 12, "Noise"**). Thus, there would be no potential for Project-related changes to local streets or highways to substantively alter the neighborhood character of the areas nearby.

**Subchapter 4C, "Transportation: Transit," Subchapter 4D, "Transportation: Parking," and Subchapter 4E, "Transportation: Pedestrians and Bicycles,"** conclude that the CBD Tolling Alternative would not result in adverse effects to transportation conditions at transit hubs; **Subchapter 5A, "Social Conditions: Population Characteristics and Community Cohesion,"** concludes that the CBD Tolling Alternative would not result in adverse effects from indirect residential displacement near transit hubs; and **Chapter 6, "Economic Conditions,"** concludes that the CBD Tolling Alternative does not have the potential to substantively alter market conditions in neighborhoods surrounding transportation hubs. Therefore, there would be no potential for Project-related changes to transportation, social, or economic conditions at transit hubs to substantively alter defining features of neighborhood character near these transit hubs.

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## 5C. Public Policy

### 5C.1 INTRODUCTION

This subchapter assesses the consistency of the CBD Tolling Alternative with public policies enacted or adopted by governmental bodies from the regional study area that are applicable to major transportation initiatives such as the Project. A public policy is a plan or program enacted by a government body to achieve a stated goal.

### 5C.2 PUBLIC POLICIES APPLICABLE TO THE PROJECT

This section describes existing public policies that are applicable to the Project. **Chapter 13, “Natural Resources,”** describes policies related to coastal zone management.

#### **5C.2.1** *OneNYC 2050: Building a Strong and Fair City, New York City’s Strategic Plan*

*OneNYC 2050*, New York City’s strategic plan, includes initiatives related to the city’s economic growth, sustainability, and resiliency.<sup>1</sup> New York City’s plans for sustainable development address the need for reducing traffic congestion, improving air quality, and improving public transportation, among other goals. The City of New York plans to reduce congestion by implementing initiatives that include, but are not limited to, leveraging new technologies to enforce traffic laws; optimizing curb use by expanding bus and bike lanes, commercial loading/unloading zones, and curb safety designs; and addressing FHV congestion and vehicles circulating without passengers in the most congested parts of New York City (including driver incentives to reduce passenger circulation within the Manhattan CBD and using CBD tolling to limit cruising in and out of the Manhattan CBD).

The *OneNYC 2050* report notes that 67 percent of all trips in New York City in 2015 were made by taking public transit, walking, and bicycling—the highest of any large U.S. city. The report identifies the goal of increasing the transit, walking, and bicycling mode share to 80 percent of all trips by 2050, which requires reducing the share of trips taken by personal automobile from 31 percent to 16 percent. The initiatives identified to achieve that goal include, among others, implementing CBD tolling to reduce traffic.<sup>2</sup>

#### **5C.2.2** *Regional Transportation Plans*

Transportation planning in metropolitan areas is guided by Federally mandated Metropolitan Planning Organizations (MPOs), which have the responsibility for addressing compliance with the Clean Air Act (see **Chapter 10, “Air Quality”**). The MPOs ensure that transportation projects conform to the states’ plans to improve air quality, as delineated in their state implementation plans. **Chapter 10, “Air Quality,” Section 10.4** provides discussion of the Project’s relationship to the NYMTC Transportation Improvement Program and the New York State Implementation Plan.

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<sup>1</sup> The City of New York. April 2019. *OneNYC 2050: Building a Strong and Fair City*. <http://onenyc.cityofnewyork.us/strategies/onenyc-2050/>.

<sup>2</sup> The City of New York. April 2019. *OneNYC 2050: Building a Strong and Fair City*. Volume 8, Efficient Mobility, p. 24.

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This study needs to be done post Covid as many have changed their travel patterns due to Covid. This is old data that should not be driving these recommendations. Please advise.



## CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT

The CBD Tolling Alternative would be consistent with and supportive of the objectives of the Climate Leadership and Community Protection Act. By reducing VMT *[within a 28-county region in New York, New Jersey, and Connecticut]*, the CBD Tolling Alternative would reduce emissions of key greenhouse gases *[(e.g., carbon dioxide and nitrous oxide)]* that are known to contribute to climate change. *[In the 12-county area including New York City, Long Island, and Putnam, Rockland, Westchester, Hudson and Bergen Counties, the CBD Tolling Alternative would reduce greenhouse gas emissions, in carbon dioxide equivalents, by 0.6 percent in 2023 and by 0.8 percent in 2045 under Tolling Scenario A (the scenario predicted to result in the lowest reduction in VMT).]* This would in turn contribute to reducing New York State's overall carbon emissions, consistent with the goals of the climate policy established by this act. *[Indeed, the CBD Tolling Alternative is identified as an emissions-reduction strategy in the Climate Action Council's Scoping Plan.]*

### 5C.4 CONCLUSION

By catalyzing regionwide reductions in vehicle volumes and VMT; precipitating mode shifts from auto to transit, walking, and cycling; reducing emissions of air pollutants and greenhouse gases; and providing a new funding source for MTA, the CBD Tolling Alternative would be consistent with and supportive of OneNYC 2050, regional transportation plans, and the Climate Leadership and Community Protection Act. By advancing a project to use, maintain, or support existing infrastructure, support activity in municipal centers, and promote mobility and sustainability, the CBD Tolling Alternative would be consistent with the Smart Growth Public Infrastructure Policy Act. **Table 5C-2** summarizes the effects of the Project.

**Table 5C-2. Summary of Effects of the CBD Tolling Alternative Related to Public Policy**

| SUMMARY OF EFFECTS | EFFECT FOR ALL TOLLING SCENARIOS   | POTENTIAL ADVERSE EFFECT | MITIGATION AND ENHANCEMENTS              |
|--------------------|--|--------------------------|--|
| No effect          | <sup>1</sup> all tolling scenarios, the Project would be consistent with regional transportation plans and other public policies in place for the regional study area and the Manhattan CBD. | No                       | No mitigation needed. No adverse effects |

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This is not accurate with respect to Battery Park City where this report acknowledges that there will be increased traffic on the exempted thoroughfares. Please conduct a study including Battery Park City.

## 6. Economic Conditions

### 6.1 INTRODUCTION

This chapter assesses the potential effects of implementing the CBD Tolling Alternative on economic conditions within the affected environment at both the regional and neighborhood levels.

### 6.2 METHODOLOGY

#### 6.2.1 Framework for Economic Conditions Analysis

An assessment of economic conditions includes consideration of a project's effects on productivity, employment, and business activity. It also considers potential economic changes that could lead to the loss of critical goods and services and/or neighborhood investment.

Economic conditions may be affected by projects in three ways:

- **Direct displacement**, which occurs when residents or businesses must move from a site or sites as a direct result of a project. Examples include the redevelopment of an already occupied site for new uses or structures, or an easement or right-of-way that would take a portion of that occupied site or property, rendering it unfit for its current use.
- **1 indirect displacement** (also known as secondary displacement), which occurs when a project alters one or more of the underlying forces that shape real estate market conditions in an area, resulting in conditions that cause the displacement of residents, businesses, or employees. Examples include lower-income residents forced out due to rising rents caused by a new concentration of higher income housing introduced by a project; a similar turnover of industrial to higher-paying commercial tenants spurred by the introduction of a successful office project in the area, or the introduction of a new use, such as residential; or increased retail vacancy resulting from business closure when a large new retailer saturates the market for particular categories of goods. Specific to the CBD Tolling Alternative, as noted in **Chapter 18, "Agency Coordination and Public Outreach,"** during early public outreach conducted in the fall of 2021, members of the public raised concerns that the additional cost of a toll could "price out" residents, visitors, and businesses from the Manhattan CBD, forcing residents to leave and businesses to close.
- **Change in the economic and operational conditions of an industry**, within or outside a directly affected area, that results in a loss or substantial diminishment of a particularly important product or service. For example, changes in operational conditions of the taxi and FHV industries could create adverse socioeconomic effects if a substantial number of residents or workers who depend on taxis or FHVs would no longer be served, thereby affecting their access to transportation. As noted in **Chapter 18,**

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**“Agency Coordination and Public Outreach,”** during early public outreach conducted in the fall of 2021, taxi/FHV vehicle drivers raised concerns about economic hardship specific to the industry.

This Project would not result in any direct displacements, because the tolling infrastructure and tolling system equipment would not require the taking of any privately owned property. Thus, the analysis in this chapter focuses on potential indirect displacement effects and potential changes in the operations of certain industries, with analysis conducted at a regional level (**Section 6.3**) and at a localized, neighborhood level (**Section 6.4**). The assessments of potential economic benefits and adverse effects utilize guidance from the National Cooperative Highway Research Program’s *Guidebook for Assessing the Social and Economic Effects of Transportation Projects*<sup>1</sup> and Chapter 5, “Socioeconomic Conditions,” of the City of New York’s 2021 *City Environmental Quality Review (CEQR) Technical Manual*.<sup>2</sup>

## 6.2.2 Study Areas

The study areas for this economic assessment are the geographic areas where the Project could alter economic conditions (either positively or negatively) to an extent that potential indirect displacement or adverse effects on specific industries could occur. The analysis assesses separate study areas for consideration of potential regional and local effects on economic conditions as set forth in **Section 6.3** and **Section 6.4**, respectively.

### 1.2.3 Data and Information Sources

The following data sources were used in this analysis:

- Best Practice Model (BPM) results (see **Subchapter 4A, “Transportation: Regional Transportation Effects and Modeling”**)
- U.S. Census Bureau, 2015–2019 American Community Survey (ACS)<sup>3</sup>
- 2012–2016 ACS from the Census Transportation Planning Package (CTPP) data product<sup>4</sup>
- 2006–2010 and 2012–2016 ACS Journey to Work<sup>5</sup>
- U.S. Census Bureau Longitudinal Employer-Household Dynamics data, available through OnTheMap<sup>6</sup>
- U.S. Department of Labor, Bureau of Labor Statistics<sup>7</sup>
- Esri Business Analyst (private data provider, for retail sales estimates by geography)<sup>8</sup>

<sup>1</sup> <https://www.ebp-us.com/en/projects/guidebook-assessing-social-economic-effects-transportation-projects>.

<sup>2</sup> [https://www1.nyc.gov/assets/oec/technical-manual/05\\_Socioeconomic\\_Conditions\\_2021.pdf](https://www1.nyc.gov/assets/oec/technical-manual/05_Socioeconomic_Conditions_2021.pdf).

<sup>3</sup> <https://www.census.gov/programs-surveys/acs/data.html>.

<sup>4</sup> <https://ctpp.transportation.org/2012-2016-5-year-ctpp/>. The CTPP data product is based on the 2012–2016 ACS 5-Year Estimates and is produced by the American Association of State Highway and Transportation Officials (AASHTO). The CTPP provides custom tables describing residence, workplace, and trip from home to work. AASHTO has not updated the CTPP to reflect more recent ACS data.

<sup>5</sup> <https://www.census.gov/topics/employment/commuting.html>.

<sup>6</sup> <https://onthemap.ces.census.gov/>.

<sup>7</sup> <https://www.bls.gov/>.

<sup>8</sup> <https://www.esri.com/en-us/arcgis/products/arcgis-business-analyst/overview>.

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The data needs to be revised for post-COVID. This will better inform the analysis in the current environment. Please advise.

- New York City Department of City Planning Neighborhood Tabulation Areas data, based on U.S. Census Bureau, 2013–2017 ACS<sup>9</sup>
- New York City Department of Consumer Affairs data related to off-street parking facilities, obtained from the New York City Department of Information Technology & Telecommunications NYCityMap program<sup>10</sup>
- U.S. Census Bureau, ZIP Code Business Patterns by Employment Size Class, 2018
- Various industry literature (specific sources cited by footnote throughout)

<sup>1</sup>These data sources were developed prior to the onset of the COVID-19 pandemic, and therefore do not reflect workforce and employment changes resulting from the pandemic, including the substantial increase in work-from-home rates. At this time, it would be speculative to estimate long-term (post-pandemic) employment levels and work-from-home rates for the region. In addition, the use of more recent data would not be appropriate given the unusual circumstances that the pandemic created.

## 6.3 REGIONAL ASSESSMENT

### 6.3.1 Regional Study Area

Both regional and local market forces influence the potential for indirect residential or business displacement; therefore, both study areas are considered as part of the neighborhood-level assessment. At the regional level, the economic conditions assessment considers whether the Project could alter the economic and operational conditions of certain types of businesses or processes by changing the movement of workers, goods and services, and consumers into, out of, and through the Manhattan CBD. The 28-county region is the study area for this analysis. This regional study area is defined in **Chapter 3, “Environmental Analysis Framework,”** and illustrated in **Figure 3-1** of that chapter.

### 6.3.2 Affected Environment

This section describes current conditions with respect to the movement of workers, goods and services, and consumers in the regional study area. The region includes portions of three states—New York, New Jersey, and Connecticut—and is home to approximately 22.2 million residents. It is the largest metropolitan economy in the United States, accounting for nearly 10 percent of the U.S. economy.<sup>11</sup> New York City serves as the social and economic core of the region, and its 8.4 million residents represent about 37 percent of the regional study area’s population.

<sup>9</sup> <https://www1.nyc.gov/site/planning/data-maps/open-data/dwn-nynta.page>.

<sup>10</sup> <http://maps.nyc.gov/doitt/nycitymap/>.

<sup>11</sup> New York City Department of City Planning. July 2018. “The Geography of Jobs NYC Metro Region Economic Snapshot.” <https://www1.nyc.gov/assets/planning/download/pdf/planning-level/housing-economy/nyc-geography-jobs-0718.pdf>.

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The pandemic created long term issues and circumstances so to not consider them when we have 3 years of data would be misinformation and deceptive.



Overall, the industry and occupation data show that relative to the region, the Manhattan CBD has high concentrations of office-based jobs such as business management, finance, and real estate, as well as service-based sectors like education and health care, retail, and arts and entertainment.

#### *Small Businesses within the Manhattan CBD*

In New York State, a small business is defined as one that has fewer than 100 employees and is independently owned and operated, as defined in Section 131 of the New York State's Economic Development Law. Small businesses with fewer than 20 employees, sometimes referred to as "Micro-businesses,"<sup>17</sup> would likely be more sensitive to goods delivery cost increases caused by the toll increases proposed under the CBD Tolling Alternative.

**1**As shown in **Table 6-4**, there are approximately 77,121 businesses in the Manhattan CBD. Most of these businesses (approximately 91.0 percent) are small businesses, and a large majority of them (78.0 percent) are also considered micro-businesses. The distribution of small businesses (and micro-businesses) among industry types within the Manhattan CBD is similar to that of businesses of all sizes. The majority of businesses in the Manhattan CBD (approximately 68.9 percent) fall within one of five industry groupings including: Professional, Scientific, and Technical Services/Management/Administrative and Waste Management Services, which is the largest category (25.0 percent); followed by Finance and Insurance, and Real Estate and Rental and Leasing (15.7 percent); Accommodation and Food Services (10.1 percent); Retail Trade (9.5 percent); and Wholesale Trade (8.5 percent).

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<sup>17</sup> [Empire State Development \(ESD\) Annual Report on the State of Small Businesses, 2021.](#)

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This would be largely impactful for small businesses in the Battery Park City area and would likely cause them to close.

United States for business, cultural, and tourism travel, its transportation network is essential to supporting the high density that underpins New York City.

More specifically, transportation users in the region would benefit economically from the CBD Tolling Alternative through travel-time savings, improved or stabilized travel-time reliability, reduced vehicle operating costs, and improved safety that are described in Chapter 5A, “Population Characteristics and Community Cohesion.” These changes would also positively affect productivity as described below:

- **Travel-Time Savings:** Travel-time savings associated with both work and non-work journeys are an economic benefit because they increase a person’s productivity and overall utility by reducing time spent on less productive activities (i.e., traveling to a destination). Reduced congestion would facilitate the more efficient and cost-effective distribution of goods and services by truck and other deliveries in the Manhattan CBD. Part of the economic benefit realized by travel-time savings benefits would be offset by the increased transportation cost for those journeys under the CBD Tolling Alternative in the form of a toll. These benefits would occur in all tolling scenarios.
- **Vehicle Operating Cost Savings:** The CBD Tolling Alternative would decrease regional VMT relative to the No Action Alternative, which could lead to vehicle operating cost savings for drivers and businesses, which is an economic benefit.
- **Reliability Benefits:** When transportation systems are improved in terms of capacity or reliability, they can have an economic benefit such as increased opportunities and higher quality of life. Improving travel-time reliability also reduces logistics and scheduling costs beyond just the travel-time savings. Reliability of travel time refers to the level of travel-time uncertainty. When travel times are unpredictable, travelers typically allow more time for their journey to account for possible delays. By reducing congestion in the Manhattan CBD, the CBD Tolling

#### **1 London Congestion Pricing**

- ❖ *Although the congestion charge in London was initially criticized by different stakeholders and interest groups for its negative impact on economy, a survey on a business group which accounted for 22 percent of London’s GDP found that the majority (over 90 percent) of the members felt either no impact or positive impact on their business, and only 9 percent reported negative impact on their business.*

*(Litman, T. 2006. London congestion pricing. Implications for Other Cities found at: <https://www.vtpi.org/london.pdf>)*

- ❖ *A 2008 study found the level of acceptability toward London congestion charge increased from about 40 percent before the charge to more than 50 percent eight months after its introduction. (Zheng, Zuduo, Liu, Zhiyuan, Liu, Chuanli, Shiwakoti, Nirajan, 2014. Understanding public response to a congestion charge: A random-effects ordered logit approach. Transportation Research Part A. In press. Found at: [http://www.connectedandautonomoustransport.com/uploads/2/5/2/6/25268286/public\\_acceptance\\_to\\_a\\_congestion\\_charge.pdf](http://www.connectedandautonomoustransport.com/uploads/2/5/2/6/25268286/public_acceptance_to_a_congestion_charge.pdf)).*

- ❖ *Separate analyses indicated pricing in London has neutral regional economic impacts, though annual surveys suggest businesses in the priced zone have outperformed those outside. In Singapore, surveys suggested that the pricing did not change business conditions or location patterns. Overall, the business community responded positively to the program.*

*(K.T. Analytics, Inc. August 2008. Lessons Learned from International Experience in Congestion Pricing, Final Report found at: [https://ops.fhwa.dot.gov/publications/fhwa\\_hop08047/intl\\_cplessons.pdf](https://ops.fhwa.dot.gov/publications/fhwa_hop08047/intl_cplessons.pdf))*

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Many exceptions were granted in the London example so this is not a fully accurate representation of what the real data shows.

Alternative would reduce the current uncertainty associated with travel in the Manhattan CBD and potentially allow travelers to reduce the buffer time set aside for their journeys.

*[Growing congestion and unreliability threatens truck transportation productivity and ultimately the ability of sellers to deliver products to market. Additionally, when deliveries cannot be relied on to arrive on time, businesses must keep extra “buffer stock” inventory on hand, which can be expensive. Pricing of the nation’s major thoroughfares to guarantee free flow of traffic will ensure that reliability is restored to the transportation system, keeping business and transportation costs low. Lower costs will increase the competitiveness of U.S. businesses in international markets and boost the U.S. economy.<sup>69</sup>]*

- **1 Safety Benefits:** Enhanced safety reduces medical costs and time spent injured/healing, both of which improve economic productivity.
- **Accessibility Benefits:** From an economic perspective, accessibility refers to the number of opportunities available for a given cost, either in terms of time or money. As the cost for movement between any two places changes, either in terms of time or money, accessibility changes. Accessibility can also be understood as the attractiveness of a place of origin (how easy it is to get from there to all other destinations) or of a destination (how easy it is to get to there from all other origins and destinations). For residents, accessibility includes access to employment, education, health care, and recreation. For businesses, it refers to access to labor, clients, support services, vendors, business partners, and deliveries. The CBD Tolling Alternative would improve accessibility for users throughout the region by decreasing congestion. In the long term, improved access to larger consumer markets and larger labor pools as well as more efficient access to resources could positively affect productivity, provide economies of scale, and lead to new economic growth. For some travelers, the introduction of a toll would decrease accessibility by disincentivizing an auto-based mode choice but given the small proportion of commuters who drive to work and the wide range of travel options other than driving available to the great majority of travelers, the effect of the CBD Tolling Alternative overall on accessibility would be positive.

### Potential Adverse Economic Effects

At a regional level, the CBD Tolling Alternative would not substantively alter one or more of the underlying forces that shape real estate market conditions, and therefore would not be likely to result in the involuntary displacement of residents, businesses, or employees. (Section 6.4 addresses the potential for indirect, or secondary, displacement at the neighborhood level.) While there would be potential social, economic, and environmental benefits from the CBD Tolling Alternative—some of which are discussed in the previous section—these factors would not be substantial enough to markedly influence residential or commercial rents within or outside of the Manhattan CBD. The study area and the Manhattan CBD have well-established residential and commercial markets that are heavily influenced by locational attributes (e.g., close proximity to job centers, cultural institutions and amenities, public transportation) that far

<sup>69</sup> [U.S. Department of Transportation Federal Highway Administration, October 2008. [Congestion Pricing: A Primer Overview.](https://ops.fhwa.dot.gov/publications/fhwahop08039/fhwahop08039.pdf) [https://ops.fhwa.dot.gov/publications/fhwahop08039/fhwahop08039.pdf.](https://ops.fhwa.dot.gov/publications/fhwahop08039/fhwahop08039.pdf)]

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There is no data supporting that it will be safer for neighborhoods like Battery Park City where you have to cross West Side Highway (Route 9a) to get to any subway/mass transit. There needs to be an assessment that includes Battery Park City.

cost), a reduction in non-work journeys to the Manhattan CBD would not be expected to substantively alter expenditures within any particular industry.<sup>73</sup>

*[The tourism industry in the Manhattan CBD is not dependent on travel by personal vehicles or taxis/FHVs, because the Manhattan CBD and tourist destinations within it are very well-served by public transit. Travel writing on New York City frequently cites transit, especially the New York City subway system, as the most convenient way to get around New York City.<sup>74</sup> This is supported by a 2014 travel survey of visitors to the Empire State Building observation deck, a notable tourist attraction, which found that approximately 4 percent of the visitors arrived by private auto or taxi, and the remainder traveled by transit, walk, or tour bus modes.<sup>75</sup> Studies have identified investments in mass transit as important to supporting the health and growth of New York City's tourism industry, both before<sup>76</sup> and after<sup>77</sup> the COVID-19 pandemic. Furthermore, traffic congestion within the Manhattan CBD, which leads to low travel speeds and unreliable travel times, can contribute to a poor-quality experience for tourists.*

*1. Visitors from the surrounding region (i.e., New York, New Jersey, Connecticut, and Pennsylvania) often travel to New York City by rail transit rather than by automobile,<sup>78</sup> and for those who drive to the city, it is likely that many park their vehicles and shift to transit for travel within the city. Furthermore, driving to and from the Manhattan CBD is already expensive given the very limited availability of free or low-cost parking and the cost of taxi/FHV fares, and it is likely that tourists who drive have higher incomes. For these individuals, the additional cost of the toll may reduce their discretionary expenditures slightly or incentivize them to choose other modes of transportation during their visit but would be unlikely to cause them to forego a visit to the Manhattan CBD. At the regional level, any forgone non-work-related journeys to the Manhattan CBD and associated expenditure would be captured elsewhere.*

*Tourist visitation data from London, England, and Stockholm, Sweden, indicates that the number of tourists visiting these cities continued to grow following the implementation of congestion-based pricing programs in 2003 and 2007, respectively. In London, the number of visiting tourists increased from 11 million in 2002 to more than 19 million in 2016. In Stockholm, the number of commercial overnight stays increased by*

<sup>73</sup> Literature research of congestion-based pricing programs in London, England, Stockholm, Sweden, *[and Singapore]* found that these programs had not adversely affected retail markets. Retail businesses in the central London charging zone have outperformed retail businesses in inner and outer London in terms of sales, profitability, and employment growth. Overall, five years after the event there is no measurable evidence of any differential impact of the central London congestion charging scheme on business and economic activity, at the aggregate level, based on analysis and surveys conducted (<https://content.tfl.gov.uk/central-london-congestion-charging-impacts-monitoring-sixth-annual-report.pdf>). In Stockholm, studies of retail markets did not reveal adverse effects resulting from congestion charges. A durables survey within shopping centers, malls, and department stores conducted during the Stockholm program's trial period found that these entities developed at the same rate as the rest of the country; the same was true for other retail sectors (<https://www.transportportal.se/swopec/cts2014-7.pdf>). In Singapore, surveys suggested that the pricing did not change business conditions or location patterns, and that overall, the business community responded positively to the program ([https://ops.fhwa.dot.gov/publications/fhwahop08047/intl\\_cplessons.pdf](https://ops.fhwa.dot.gov/publications/fhwahop08047/intl_cplessons.pdf)).]

<sup>74</sup> [<https://www.nycgo.com/plan-your-trip/basic-information/transportation-in-nyc/getting-around>.]

<sup>75</sup> [Vanderbilt Corridor and One Vanderbilt Final Environmental Impact Statement. March 2015.

[https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/vanderbilt/10\\_feis.pdf](https://www1.nyc.gov/assets/planning/download/pdf/applicants/env-review/vanderbilt/10_feis.pdf). pg. 10-7.]

<sup>76</sup> [*Ibid.* pg. 34.]

<sup>77</sup> [Office of the New York State Comptroller. *The Tourism Industry in New York City* "Reigniting the Return. April 2021. Available: <https://www.osc.state.ny.us/files/reports/osdc/pdf/report-2-2022.pdf>. pg. 16.]

<sup>78</sup> [NYC and Co. <https://indd.adobe.com/view/e91e777a-c68b-4db1-a609-58664a52cfff>. pg. 7.]

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All of this data needs to be reflective of the post-COVID situation as this is not accurate. People have changed some behaviors for safety and health reasons.



#### **4.1.2** *Neighborhood Streets Experiencing Increases or Decreases in Traffic*

The CBD Tolling Alternative would result in an overall net reduction in auto journeys to and from the Manhattan CBD. Depending on the tolling scenario and the specific crossing credits included for other tolls paid at bridges and tunnels, certain local streets are projected to experience increases in vehicle traffic from route diversions. **Subchapter 4B, “Transportation: Highways and Local Intersections,”** provides detail on these locations and presents the results of intersection-level traffic impact analysis. The predicted changes in traffic volumes would be small compared to the overall volume of traffic on city streets during the day. As a result, there would be no anticipated change to the overall operation or character of local streets and no effect on economic conditions.

Increases and decreases in vehicle traffic along road segments resulting from the CBD Tolling Alternative would not substantively alter local market conditions for the following reasons:

- **These locations already experience traffic at levels that influence market conditions.** Areas where traffic volumes would increase already experience high levels of vehicle traffic, and in any case, local market conditions are more heavily influenced by existing pedestrian traffic. Therefore, such changes in traffic would not be expected to alter economic conditions at the neighborhood level. Outside the Manhattan CBD, few roadway segments would experience increases in vehicle traffic exceeding 20 percent over the No Action Alternative under any tolling scenario, and these segments would be primarily on highways such as the Long Island Expressway.
- **Car journeys to commercial businesses represent a small percentage of all consumer journeys in and immediately surrounding the Manhattan CBD.** Based on CTPP data, in general fewer than 10 percent of all journeys made to local businesses in the Manhattan CBD are made by auto. Given that the BPM predicts that the CBD Tolling Alternative would reduce non-work auto journeys to the Manhattan CBD by no more than 13 percent (the highest reduction, under Tolling Scenario D), the reduction in non-work journeys to the Manhattan CBD would be no more than approximately 1.3 percent (i.e., a 13 percent reduction of 10 percent of consumer base). Because some of those auto-based trips would transition to transit, the loss of consumer base is expected to be even less than 1.3 percent.
- **Areas receiving incremental traffic (e.g., roadways near the Queens-Midtown Tunnel and the Hugh L. Carey Tunnel) are largely “pass-through” locations.** A vast majority of automobile travelers are not stopping at these locations and therefore would not add consumer spending to these local areas. The Project-generated shifts in traffic would not be attributed to attractions to/from businesses along routes, but rather they would be in response to the imposed tolling program, resulting in different route choices. Therefore, they would have little or no effect on consumer journeys to any particular business, except for perhaps parking facilities (addressed later in this subchapter).

Based on the above, detailed assessment of potential economic effects along neighborhood streets is not warranted and no adverse effect on economic conditions is anticipated.

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Battery Park City needs to be included in this study and it does not appear to have been part of the analysis.  
Please clarify.

## 8. Historic and Cultural Resources

### 8.1 INTRODUCTION

As a project requiring FHWA approval, the CBD Tolling Program is an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. This chapter documents the steps taken to comply with Section 106 review and consultation and summarizes the assessment of effects on historic properties, as identified through the Section 106 process and contained in the Section 106 Finding Documentation prepared for the Project (see **Appendix 8, “Historic and Cultural Resources: Section 106 Finding Documentation”**).

**1** addition, because the Project is subject to review by FHWA, it must also comply with Section 4(f) of the U.S. Department of Transportation Act of 1966. Section 4(f) stipulates that FHWA may not approve the use of Section 4(f) properties unless they have determined that certain conditions apply. **Chapter 19, “Section 4(f) Evaluation,”** of this Environmental Assessment provides an evaluation of the Project’s consistency with the requirements of Section 4(f) regarding historic sites.

### 8.2 SECTION 106 PROCESS

The Section 106 process includes the following steps:

- Initiation with State Historic Preservation Office (SHPO), Federally recognized Native American tribes, and other Consulting Parties
- Definition of the Area of Potential Effect (APE) for the build alternatives
- Identification of historic properties in the APE
- Evaluation of effects on historic properties in the APE
- Consideration of measures to avoid, minimize, or mitigate adverse effects if present
- Documentation of assessment of effects on historic properties
- Consultation to avoid, minimize, or mitigate adverse effects, if present, with agreed upon measures typically stipulated in a memorandum of agreement

### 8.3 IDENTIFICATION OF HISTORIC PROPERTIES

Identification of historic properties was conducted in accordance with the requirements of 36 CFR Part 800 for implementing Section 106 of the NHPA and in consultation with the SHPO. As noted above, historic properties include any district, site, building, structure, or object listed in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR Section 800.16(l)). Although Section 106 applies to NRHP-listed or eligible properties, properties designated New York City landmarks have been included. All but two of the identified New York City landmarks also have NRHP designations.

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"Section 4(f) of the U.S. Department of Transportation Act (U.S. DOT ACT) protects publicly owned and accessible parks, recreation areas, and wildlife and waterfowl refuges and historic sites, regardless of ownership and accessibility. " Due to the population of CBD that was highly affected by 9/11 Air Quality, accessibility must also be analyzed under the Disability Policy Priorities.

Commission (LPC) has designated (or considered eligible for such designation) as individual New York City Landmarks and Scenic Landmarks (NYCLs) or New York City Historic Districts (NYCHDs) were identified. A review of the CRIS identified 45 historic properties within the APE. The properties consist of architectural resources, including buildings, structures, and districts.

## 8.4 ASSESSMENT OF EFFECTS

### 8.4.1 No Action Alternative

The No Action Alternative would not result in a vehicular tolling program; therefore, it would not involve the installation of tolling infrastructure and tolling system equipment. The No Action Alternative would not result in any physical changes in the APE and therefore would not result in any direct or indirect effects to historic properties.

### 8.4.2 CBD Tolling Alternative

The Project's effects on historic properties were assessed as part of the Section 106 Finding Documentation (see **Appendix 8, "Historic and Cultural Resources: Section 106 Finding Documentation"**). **Table 8-1** provides a description of the historic architectural properties in the APE and a summary of the Project's changes on or near the properties.

Within the APE, the CBD Tolling Alternative would result in new tolling infrastructure and tolling system equipment (i.e., cameras and E-ZPass readers) on the structural elements at two historic bridges—the Ed Koch Queensboro Bridge and the Manhattan Bridge—and at the Manhattan portals of the Lincoln Tunnel. **1** addition, the CBD Tolling Alternative would place new tolling infrastructure and tolling system equipment on the underside of the High Line, a former freight railroad viaduct. New poles with tolling system equipment mounted directly on them or from mast arms extending over the streetbeds would be installed on city streets and sidewalks and other at-grade roadways, including new poles in new locations and replacement poles in the same locations (see **Chapter 2, "Project Alternatives,"** for a description of tolling infrastructure and tolling system equipment). These include poles within Central Park and historic districts and poles on the same blocks as individual historic properties. (Refer to **Appendix 8, "Historic and Cultural Resources: Section 106 Finding Documentation,"** for the specific locations of the tolling infrastructure and tolling system equipment.)

As summarized above and described in the Section 106 Finding Documentation, the CBD Tolling Alternative would result in minor changes to the affected historic bridges, tunnel, and High Line structure. It would not alter the historic characteristics of historic districts and would result in minimal changes to the settings of individual historic properties in the APE. The CBD Tolling Alternative would not result in changes that would alter the characteristics that qualify historic properties for listing in the NRHP, nor would it diminish the integrity of any historic property's location, design, setting, materials, workmanship, feeling or association, including the three NHLs in the APE: the Holland Tunnel, the McGraw-Hill Publishing Company Building, and Central Park.

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This does not account for the environmental impact of increased traffic/ congestion or the safety impact on those entering/ exiting the High Line. This foot traffic within the context of increased car traffic must be accessed.

Figure 8-1. **1** Overview of Area of Potential Effects

Source: ArcGIS Online, <https://www.arcgis.com/index.html>.

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Area of Potential Affects does not access impact of Battery Park Underpass congestion on access to the 9/11 Memorial. Increased congestion will make crossing the West Side Highway less accessible, especially for young children and disabled.